

TSD File Inventory Index

Date: August 19, 2003

Initial: CMH/hrs

Facility Name: <u>C. P. Hall Company (The Filder Site)</u>			
Facility Identification Number: <u>1LT 180 D/D 340</u>			
A.1 General Correspondence		B.2 Permit Docket (B.1.2)	
A.2 Part A / Interim Status		.1 Correspondence	
.1 Correspondence	Y	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	Y	C.1 Compliance - (Inspection Reports)	X
.3 Part A Application and Amendments	Y	C.2 Compliance/Enforcement	X
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		C.3 FOIA Exemptions - Non-Releasable Documents	1
A.3 Groundwater Monitoring		D.1 Corrective Action/Facility Assessment	
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	
.2 Closure/Post Closure Plans, Certificates, etc		D. 2 Corrective Action/Facility Investigation	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 7

5 RFI QAPP		.7 Lab data, Soil Sampling/Groundwater	
.6 RFI QAPP Correspondence		.8 Progress Reports	
.7 Lab Data, Soil-Sampling/Groundwater		D.5 Corrective Action/Enforcement	
.8 RFI Progress Reports		.1 Administrative Record 3008(h) Order	
.9 Interim Measures Correspondence		.2 Other Non-AR Documents	
.10 Interim Measures Workplan and Reports		D.6 Environmental Indicator Determinations	
D.3 Corrective Action/Remediation Study		.1 Forms/Checklists	
.1 CMS Correspondence		E. Boilers and Industrial Furnaces (BIF)	
.2 Interim Measures		.1 Correspondence	
.3 CMS Workplan		.2 Reports	
.4 CMS Draft/Final Report		F Imagery/Special Studies (Videos, photos, disks, maps, blueprints, drawings, and other special materials.)	
.5 Stabilization		G.1 Risk Assessment	
.6 CMS Progress Reports		.1 Human/Ecological Assessment	
.7 Lab Data, Soil-Sampling/Groundwater		.2 Compliance and Enforcement	
D.4 Corrective Action Remediation Implementation		.3 Enforcement Confidential	
.1 CMI Correspondence		.4 Ecological - Administrative Record	
.2 CMI Workplan		.5 Permitting	
.3 CMI Program Reports and Oversight		.6 Corrective Action Remediation Study	
.4 CMI Draft/Final Reports		.7 Corrective Action/Remediation Implementation	
.5 CMI QAPP		.8 Endangered Species Act	
.6 CMI Correspondence		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: *Documents do not justify individual folder per schedule.*



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

RECEIVED
WMD RECORD CENTER

SEP 29 1995

*The C.P. Hall Co
Christopher G. Muringer
P.O. Box 608
Bedford Park, Ill 60499*

REPLY TO THE ATTENTION OF:

This is in response to your letter of 8/9/95 regarding
the following installation:

U.S. EPA ID NUMBER:

Ill 180 010 340

LOCATION OF INSTALLATION:

5851 W 73rd St

Bedford Park, Ill 60499

According to the information submitted, you have indicated that this facility is no longer in need of the U.S. EPA ID number. Your ID number has been coded as an inactive number. DO NOT USE this number without re-notifying the U.S. EPA of your activity.

If you have any questions or need further assistance, please contact me at (312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

Enclosure

cc: State Agency
File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

May 2, 1994

THE C P HALL CO
ATTN: JAMES T HARVILCHUCK
311 S WACKER STE 4700
CHICAGO IL 60606

RECEIVED
WMD RECORD CENTER
MAY 03 1994

RE: US EPA ID Number ILT 180 010 340
Location: 5851 W 73RD ST
BEDFORD PARK IL 60499

In response to your correspondence of 01-07-94, the following
information has been updated:

INSTALLATION MAILING ADDRESS

311 S WACKER STE 4700
CHICAGO IL 60606

If you have any questions, please call me at (312) 886-6173.

Sincerely,

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File



Printed on Recycled Paper



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 5
RCRA ACTIVITIES
P.O. BOX A3587
CHICAGO, ILLINOIS 60690

OCT 17 1991

THE C P HALL CO
ATTN JAMES HARVILCHUCK
5851 W 73RD ST
BEDFORD PARK IL 60638

RE: EPA ID #: ILT 180 010 340

In response to your request of 9/6/91 the following
information has been updated:

Installation contact to
Contact phone number
Addition waste code

JAMES HARVILCHUCK
708 594 5065
U154 F002 AND F003

If you have any questions, please contact me at (312) 886-6173.

Sincerely,

A handwritten signature in cursive script, appearing to read "Sharon Kiddon".

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

cc: State Agency
File



ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• ILT180010340

REACKNOWLEDGEMENT

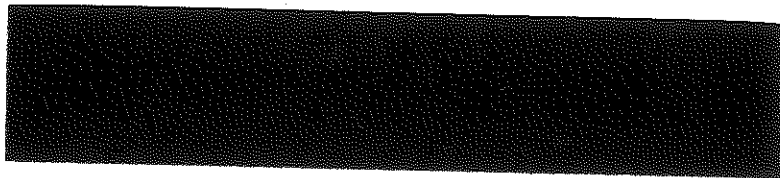
HALL C P COMPANY THE
7300 S CENTRAL AVENUE
BEDFORD PARK

IL 60638

INSTALLATION ADDRESS

5851 W 73RD STREET
BEDFORD PARK

IL 60638



U.S. ENVIRONMENTAL PROTECTION AGENCY
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

ILT180010340

139

I. NAME OF INSTALLATION

ILD004163283

II. INSTALLATION MAILING ADDRESS

HALL C P COMPANY THE*
7300 S CENTRAL AVE
CHICAGO, IL 60638

000077 AUG-180

III. LOCATION OF INSTALLATION

5851 W. 73RD ST.
7300 S CENTRAL AVE
CHICAGO, IL 60638

BEDFORD PARK, IL 60638

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

FOR OFFICIAL USE ONLY

COMMENTS

PART A WITHDRAWAL APPROVED -
TSD DELETED

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED
(yr., mo., & day)

FILT180010340

A

800801

HALL CP COMPANY the

I. NAME OF INSTALLATION

THE C P HALL COMPANY THE

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

7300 S CENTRAL AVENUE

CITY OR TOWN

ST.

ZIP CODE

BEDFORD PARK

IL 60638

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

5851 W 73RD STREET

CITY OR TOWN

ST.

ZIP CODE

BEDFORD PARK

IL 60638

IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, & job title)

PHONE NO. (area code & no.)

MIXSON KARL J PLANT MANAGER

312-458-2365

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

THE C P HALL COMPANY

B. TYPE OF OWNERSHIP
(enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F = FEDERAL
M = NON-FEDERAL

M

☒ A. GENERATION☐ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☐ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

Until 7/28/80 we were located @ 7300 S. Central Ave.. Our entire production facility has been relocated to III above

☐ A. FIRST NOTIFICATION☒ B. SUBSEQUENT NOTIFICATION (complete item C)

C. INSTALLATION'S EPA I.D. NO.

ILT180010340

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

ILT180010340

I.D. - FOR OFFICIAL USE ONLY

W	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
---	---	---	---	---	---	---	---	---	---	----	----	----	----	----	----

IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
7	8	9	10	11	12
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
19	20	21	22	23	24
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
25	26	27	28	29	30
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
PR100	V031	V140	V154	V190	
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
37	38	39	40	41	42
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26
43	44	45	46	47	48
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
23 - 26	23 - 26	23 - 26	23 - 26	23 - 26	23 - 26

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE
(D001)

☐ 2. CORROSIVE
(D002)

☐ 3. REACTIVE
(D003)

☒ 4. TOXIC
(D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE <i>Karl J. Mixson</i>	NAME & OFFICIAL TITLE (type or print) Karl J. Mixson Plant Manager	DATE SIGNED 7/28/80
------------------------------------	---	------------------------

EPA Form 8700-12 (6-80) REVERSE

Our entire production facility has been relocated to III above
we were located @ 7000 S. Central Ave. Our entire
production facility has been relocated to III above

AUG 01 1980



The C.P. Hall Company

Chemicals for Industry Since 1919

7300 SOUTH CENTRAL AVENUE

P.O. BOX 608

BEDFORD PARK, ILLINOIS 60499-0608

RECEIVED
ID RECORD CENTER

OCT 13 1995

(708) 594-5900
FAX (708) 458-0428

September 29, 1995

Sharon Kiddon
Waste Management Division
U.S. EPA
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

RECEIVED
OCT 3 1995

SUPERFUND PROGRAM
MANAGEMENT BRANCH

Dear Ms. Kiddon:

This is a response to your letter notifying me that you have inadvertently deactivated the USEPA ID Number for the following facility:

The C. P. Hall Company
5851 W. 73rd St.
Bedford Park, IL 60499

ID No. ILT 180010340

I have been notified of the deactivation due to a letter I sent to USEPA on 8/9/95 informing your office of this issue. I do not have any record or recollection of sending such a letter to your office.

I am informing the USEPA that this facility is still currently a waste generator and this ID Number should continue to be active.

Please contact me at (708)594-5978 regarding this issue as soon as possible.

Sincerely,

Christopher G. Meringer
Regulatory Affairs Supervisor

CGM:kl

ENTERED MAR 17 1994

JAN 05 '94 10:28AM

JAN 7 1994 P.2



The C.P. Hall Company

Chemicals for Industry Since 1919

5851 WEST 73RD STREET

P.O. BOX 910

BEDFORD PARK, ILLINOIS 60499-0910

0310125037
COOK - CO

(708) 594-5990
FAX (708) 458-0629

Mr. Jim Pierce
ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
Bureau of Land, Planning and Reporting Section
P. O. Box 19276
Springfield, Illinois 62794-9276

RE: Change of Mailing Address

Dear Mr. Pierce,

ILT 180010340

The C. P. Hall Company has recently changed our mailing address and also established a new corporate office in Chicago. All IEPA correspondence regarding our manufacturing facility at 5851 W. 73rd Street, Bedford Park (IEPA Generator # 031 01250 37) and our warehouse at 7300 S. Central Ave., Bedford Park, should be sent to the following individual at our corporate office:

Mr. James T. Harvilchuck
Director of Regulatory Affairs
The C. P. Hall Company
311 S. Wacker, Suite 4700
Chicago, IL 60606-6604

Mailing

The mailing addresses for the facilities listed above are as follows:

Loc.

The C. P. Hall Company
Manufacturing and Technical Center
5851 W. 73rd Street
P. O. Box 910
Bedford Park, Illinois 60499-0910

The C. P. Hall Company
Midwest Region
7300 S. Central Avenue
P. O. Box 608
Bedford Park, Illinois 60499-0608

Federal Express, UPS, etc. shipments should be sent to Bedford Park, Illinois 60638.

If you have any questions regarding this matter please feel free to call me directly at the 5851 W. 73rd St. facility at (708) 594-5978.

Sincerely,

Mark A. Kuklinski

Mark A. Kuklinski

400 : 104 12345



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:
5HS-JCK-13

JAN 22 1986

Mr. Jerry Schneipp
The C.P. Hall Company
5851 West 73rd Street
Bedford Park, Illinois 60638
U.S. EPA ID#: ILT 180 010 340

Dear Mr. Schneipp:

This is in response to our phone conversation on January 16, 1986. During that conversation, you explained that the C.P. Hall Company has been operating under the United States Environmental Protection Agency (U.S. EPA) identification number: ILD 980 502 231 since January, 1983. You have received calls from Gregory Zak, Manager of the Compliance Assurance Unit, at the Illinois Environmental Protection Agency (IEPA) questioning why C.P. Hall Company has been using an identification number that does not exist in the Resource Conservation and Recovery Act (RCRA) computer printout supplied by the U.S. EPA to the IEPA.

I have pulled C.P. Hall's notification file and have found a copy of a letter sent from the U.S. EPA to C.P. Hall Company on December 14, 1982, which instructed your plant manager to convert to a new identification number: ILD 980 502 231. A copy of this letter is enclosed. The identification number change never took place. C.P. Hall Company has continued to be listed under: ILT 180 010 340 in our data base and in the computer printouts that we supply to IEPA. I believe that this is the basis for the confusion between C.P. Hall Company and the IEPA.

You have stated that you will use only the ILT 180 010 340 number in the future, and discontinue all use of ILD 980 502 231.

I will send a copy of this letter to Gregory Zak at the IEPA in an effort to prevent further problems with your manifests, annual reports and other hazardous waste management reports and documents required under Subtitle C of RCRA. If you find that you are in need of further assistance, please contact me at (312) 886-6142.

Sincerely,

Denise Baker
Environmental Protection Specialist

Enclosure

cc: Greg Zak, IEPA
Brian Newquist, IEPA



ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

DEC 14 1982

MIXSON KARL J PLANT MANAG
HALL C P CO THE
7300 S CENTRAL AVENUE
BEDFORD PARK IL 60638
FACILITY: 5851 W 73RD ST
LOCATION: BEDFORD PARK IL 60638
ID NO.: ILT180010340

Dear Applicant:

RE: U.S. EPA Identification Number Change

This is to inform you that the United States Environmental Protection Agency (U.S. EPA) will be changing your temporary (T) identification number to a permanent (D) one. The label below shows your current temporary number as "OLD T NO." and the new permanent number as "NEW D NO."

OLD I.D. NO.: ILT180010340

~~NEW I.D. NO.: ILD980502231~~

DIDN'T CHANGE

In order to provide your facility with adequate time to convert to the permanent U.S. EPA identification number, we will make the change in our computer system effective January 1, 1983. This will allow you to use your temporary identification number until the end of the calendar year and, thus, cover all 1982 hazardous waste handled under one number for your annual report.

We have coordinated the identification number change with your State hazardous waste management office. The State has a listing of your old and new numbers.

Please contact Mr. Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions regarding this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Facility owner



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

10 NOV 1982

Mr. J. R. Klusendorf, Vice President and Treasurer
The C. P. Hall Company
7300 South Central Avenue
Chicago, Illinois 60638

RE: Withdrawal of Part A (Recycling)
FACILITY NAME: The C. P. Hall Company
USEPA ID NO.: ILT 180 010 340

Dear Mr. Klusendorf:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of September 16, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility uses, re-uses, recycles, or reclaims its waste as described in 40 CFR Part 261.6. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Recycling)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Mr. Karl J. Mixson, Plant Manager
IEPA

"A"

80/08101-1

80/11/19 K5

031012503

Please print or type with ELITE type (12 characters per inch) in the unshaded areas only

Form Approved. OMB No. 2050-0028. Expires 10-31-91
GSA No. 0246-EPA-OT

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

Date Received
(For Official Use Only)

SEP 06 1991

EPA REGION V

I. Installation's EPA ID Number (Mark 'X' in the appropriate box)

☐

A. First Notification

☒

B. Subsequent Notification
(complete item C)

C. Installation's EPA ID Number

I L T 1 8 0 0 1 0 3 4 0

II. Name of Installation (Include company and specific site name)

T H E C. P. H A L L C O M P A N Y

III. Location of Installation (Physical address not P.O. Box or Route Number)

Street

5 8 5 1 W E S T 7 3 R D S T R E E T

Street (continued)

City or Town

State

ZIP Code

B E D F O R D P A R K

I L 6 0 6 3 8 -

County Code

County Name

C O O K

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

S A M E

City or Town

State

ZIP Code

V. Installation Contact (Person to be contacted regarding waste activities at site)

Name (last)

(first)

H A R V I L C H U C K

J A M E S

Job Title

Phone Number (area code and number)

R E G A F F A I R S M G R

7 0 8 - 5 9 4 - 5 0 6 5 -C

VI. Installation Contact Address (See instructions)

A. Contact Address
Location Mailing

☒☐

B. Street or P.O. Box

City or Town

State

ZIP Code

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

T H E C. P. H A L L C O M P A N Y

Street, P.O. Box, or Route Number

7 3 0 0 S O U T H C E N T R A L A V E.

City or Town

State

ZIP Code

C H I C A G O

I L 6 0 6 3 8

Phone Number (area code and number)

B. Land Type

C. Owner Type

D. Change of Owner
Indicator

(Date Changed)
Month Day Year

7 0 8 - 5 9 4 - 6 0 0 0

P

P

Yes

No

X

MD OCT 14 1991 JW

C

OCT 14 1991 AB

RECEIVED

AUG 28 1991

EPA-DLPC

EPA Form 8700-12 (01-90) Previous edition is obsolete.



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

20 AUG 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mr. Karl J. Mixson, Plant Manager
C. P. Hall Company
7300 South Central Avenue
Bedford Park, Illinois 60638

RE: Request for Information--Hazardous Waste Permit
Review (Recycling)
FACILITY: C. P. Hall Company
NAME: USEPA ID NO.: ILT 180 010 340

Dear: Mr. Mixson:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act, as amended; however, further clarification is needed.

Based on the information submitted, your facility appears to use, re-use, recycle or reclaim its waste, as described in 40 CFR Part 261.6 (enclosed). Please review these requirements to determine if your facility qualifies as a recycler. If it does, a permit is not required, and you should withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn. If at any time since November 19, 1980, your operation included treatment, storage, or disposal of hazardous waste subject to 40 CFR Part 265, a closure plan must be filed with the withdrawal request. Requirements for closure are found at 40 CFR Part 265, Subpart G (enclosed).

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information --Recycling," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosures

cc: Mr. J. R. Klusendorf, Vice President-Treasurer

6259
100

The C. P. Hall Company

Established 1919

CHEMICALS FOR INDUSTRY

7300 S. CENTRAL AVENUE

CHICAGO, ILLINOIS 60638

ANDERSON, SOUTH CAROLINA
CHICAGO, ILLINOIS
MEMPHIS, TENNESSEE
STOW, OHIO
TORRANCE, CALIFORNIA

(312) 767-4600
(312) 458-2365
TWX 910-224-5102

June 27, 1983

ILT186010340 G, PA
ILD004163283

Mr. Kenneth P. Bechely
Northern Region Manager
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, Ill. 60153

RECEIVED
JUN 28 1983

WASTE MANAGEMENT
BRANCH

Dear Mr. Bechely:

On May 11, 1983 a representative of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of our facility. In the process of inspection I had an opportunity to review with Ms. Bonnie Eleder, the IEPA representative, our overall waste generating activity and was advised that our facility is presently not regulated under 35 Ill. Adm. 720 through 725.

Therefore, we request that our EPA Form 8700-12 Notification of Hazardous Activity be withdrawn.

Presently we have 3 hazardous waste permit numbers as follows:

PERMIT NO.	EXPIRES
820540-19704502	3/30/86
830134-03103901	2/ 1/86
992582	5/29/85

Your cooperation will be of great help to us. If you have any questions, please feel free to call me.

Sincerely,

RECEIVED
7/10 7/83

Seung N. Tae

Seung Nam Tae
Project Engineer
C. P. Hall Company

SNT:sw

CC: USEPA

230 S. Dearborn St.
Chicago, Ill. 60604

The C. P. Hall Company

Established 1919

CHEMICALS FOR INDUSTRY

7300 S. CENTRAL AVENUE

CHICAGO, ILLINOIS 60638

ANDERSON, SOUTH CAROLINA
CHICAGO, ILLINOIS
MEMPHIS, TENNESSEE
STOW, OHIO
TORRANCE, CALIFORNIA

(312) 767-4600
(312) 458-2365
TWX 910-224-5102

September 16, 1982

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
United States Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

RE: Permit Application Withdrawal Letter
FACILITY: The C. P. Hall Company
7300 South Central Ave.
Bedford Park, Illinois 60638
USEPA ID NO.: ILD 004 163 283

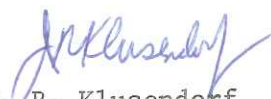
Dear Mr. Klepitsch:

This is to acknowledge receipt of your letter of September 14, 1982 requesting a resubmittal of our request under the correct signature and certification.

As explained in our letter of July 2, 1981, we originally filed because we were not clear at that time as to the regulations, nor their affect on the use of the facility. Since then, all waste material has been removed through proper channels from the site prior to our original filing for a permit and no waste materials have been stored at this location since. Since we do not foresee a change in this position we are requesting the withdrawal of our Part A Hazardous Permit application.

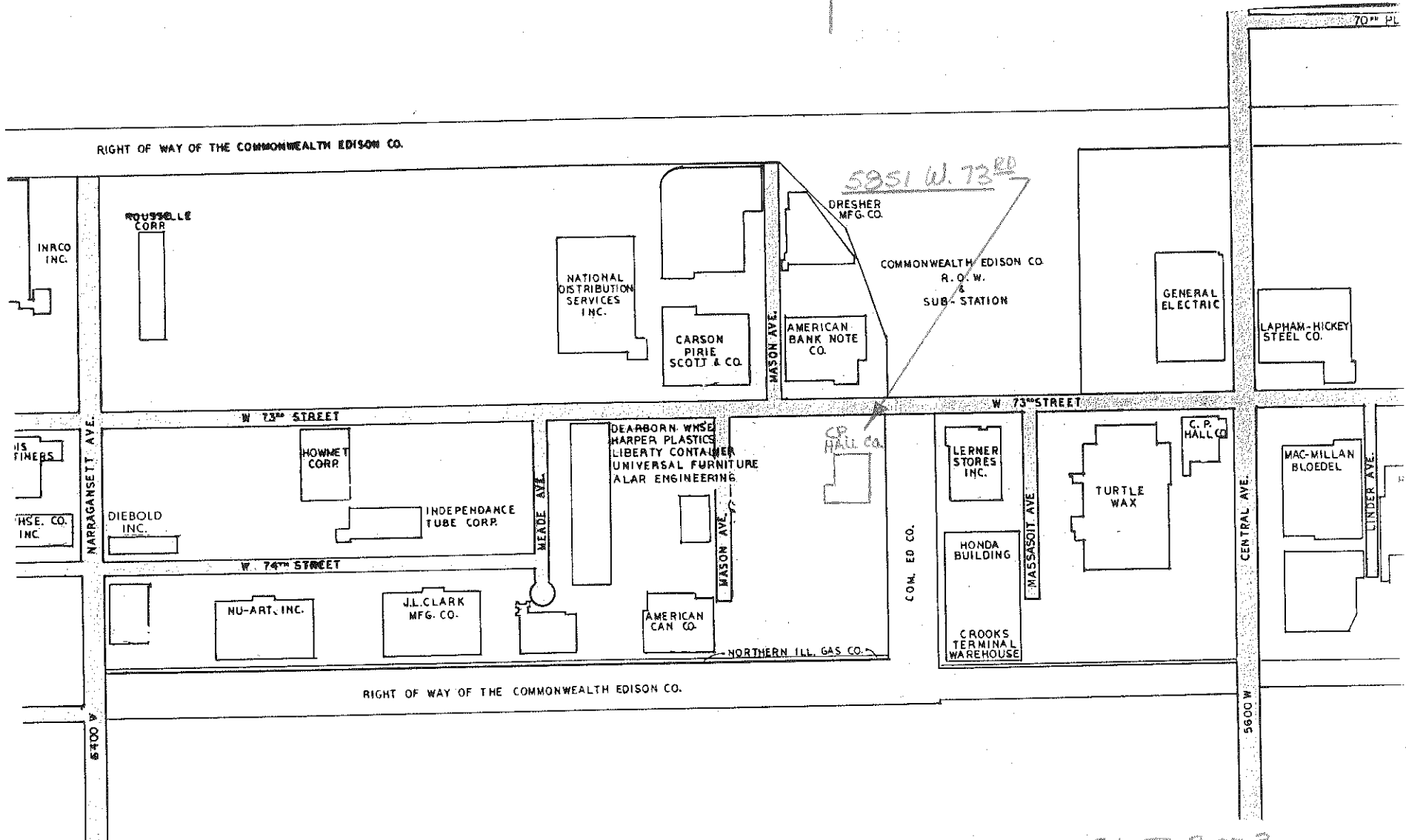
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,


J. R. Klusendorf
Vice President and Treasurer

JRK:dlm

380



SHEET 2 OF 3
 INSET
 THE C.P. HALL CO
 5851 WEST 73RD ST.
 BEDFORD PARK, IL

SCALE 1:7800

Bedford Park Area

SHEET 1 OF 3

SEE SHEET 3
FOR INSET - 7300 S. CENTRAL
- SEE SHEET 2
FOR INSET - 5851 W. 73rd

LOCATION MAP
THE C. P. HALL CO.
BEDFORD PARK, IL
SCALE 1:142,000



C. P. HALL CO
0310, 25040
COOK - CO. Glen Cove

CHANGE OF ADDRESS NOTICE

- Please be advised that the Regulatory Affairs Department of The C. P. Hall Company has moved to a new location. Please change your records.

ILT 180010340

RECEIVED

Old Address

The C. P. Hall Company
Regulatory Affairs Dept.
5851 W. 73rd St.
P. O. Box 910
Bedford Park, IL 60499-0910

AUG 09 1995

- NN7

U. S. EPA, REGION V
SWB - PMS

RCRIS ENTRY SEP 20 1995

NEW ADDRESS

The C. P. Hall Company
Regulatory Affairs Dept.
7300 S. Central Avenue
P. O. Box 608
Bedford Park, IL 60499-0608

Fax No. (708)458-0428

PLEASE DIRECT CORRESPONDENCE TO: Christopher G. Meringer
Regulatory Affairs Supervisor
(708) 594-5978

C -
Contact

FORM 1 GENERAL		U.S. ENVIRONMENTAL PROTECTION AGENCY GENERAL INFORMATION <i>Consolidated Permits Program</i> <i>(Read the "General Instructions" before starting.)</i>	I. EPA I.D. NUMBER <div style="border: 1px solid black; padding: 2px;"> F I L D 0 6 4 1 6 3 2 8 3 </div>
LABEL ITEMS I. EPA I.D. NUMBER II. FACILITY NAME V. FACILITY MAILING ADDRESS VI. FACILITY LOCATION		PLEASE PLACE LABEL IN THIS SPACE <div style="font-size: 1.5em; color: blue; margin-top: 20px;"> ILT180010340 </div>	GENERAL INSTRUCTIONS If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X		B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)		X		D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X			F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X		H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X		J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	

III. NAME OF FACILITY

1 **SKIP** THE C P HALL COMPANY HALL C P COMPANY the

IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)	B. PHONE (area code & no.)
2 <u>MIXSON KARL J PLANT MANAGER</u>	<u>312 458 2365</u>

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX	B. CITY OR TOWN
3 <u>7300 S CENTRAL AVENUE</u>	<u>BEDFORD PARK</u>
C. STATE D. ZIP CODE	
<u>IL</u>	<u>60638</u>

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER	B. COUNTY NAME
5 <u>5851 W 73rd STREET</u>	<u>COOK</u>
C. CITY OR TOWN	D. STATE E. ZIP CODE F. COUNTY CODE (if known)
6 <u>BEDFORD PARK</u>	<u>IL 60638</u>

VII. SIC CODES (4 digit, in order of priority)

A. FIRST				B. SECOND			
7	2	8	6	7			
(specify) Industrial organic chemicals, not elsewhere classified				(specify)			
C. THIRD				D. FOURTH			
7				7			
(specify)				(specify)			

VIII. OPERATOR INFORMATION

A. NAME												B. Is the name listed in Item VIII-A also the Owner?			
THE C P HALL COMPANY												<input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)															
F = FEDERAL				M = PUBLIC (other than federal or state)				P (specify)				D. PHONE (area code & no.)			
S = STATE				O = OTHER (specify)								A 3 1 2 4 5 8 2 3 6 5			
P = PRIVATE															
E. STREET OR P.O. BOX															
7 3 0 0 S CENTRAL AVENUE															
F. CITY OR TOWN										G. STATE		H. ZIP CODE		IX. INDIAN LAND	
BEDFORD PARK										I L		6 0 6 3 8		Is the facility located on Indian lands?	
														<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)									
9 N										9 P									
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)									
9 U										7 9 8 2 6 (specify)									
										Chicago Metropolitan Sanitary Dist.									
C. RCRA (Hazardous Wastes)										E. OTHER (specify)									
9 R										0 3 1 8 2 1 A B E (specify)									
										Ill. EPA Air Pollution									

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

XII. NATURE OF BUSINESS (provide a brief description)

This location houses the Research and Development function and the Company's manufacturing plant. Our role in industry is to provide specialty esterified chemicals for use primarily in the Rubber, Plastics and Oil Industries.

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)		B. SIGNATURE		C. DATE SIGNED	
J.R. Klusendorf Vice President/Treas.		<i>J. Klusendorf</i>		November 13, 196	

COMMENTS FOR OFFICIAL USE ONLY

--	--	--	--	--	--	--	--	--	--	--	--	--	--

5851 W. 73rd St.

Please print or type in the unshaded areas only
(fill-in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

380

FORM
3
RCRA



HAZARDOUS WASTE PERMIT APPLICATION
Consolidated Permits Program
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER
FIELD 0004163283

FOR OFFICIAL USE ONLY

APPLICATION PROVED DATE RECEIVED (yr., mo., & day)

COMMENTS

1LT 180010340

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

- ☐ 1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

☒ 2. NEW FACILITY (Complete item below.)

YR. MO. DAY
8 0 11 03

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

YR. MO. DAY
8 0 11 03

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

- ☐ 1. FACILITY HAS INTERIM STATUS

- ☐ 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.
2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	V	ACRE-FEET	A
LITERS	L	TONS PER HOUR	D	HECTARE-METER	F
CUBIC YARDS	Y	METRIC TONS PER HOUR	W	ACRES	B
CUBIC METERS	C	GALLONS PER HOUR	E	HECTARES	Q
GALLONS PER DAY	U	LITERS PER HOUR	H		

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)				1. AMOUNT	
		2. UNIT OF MEASURE (enter code)				2. UNIT OF MEASURE (enter code)	
X-1	S 0 2	600	G	5			
X-2	T 0 3	20	E	6			
1	S 0 1	4,000	G	7			
				8			
3				9			
4				10			

III. PROCESSES (continued)

C. SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE
INCLUDE DESIGN CAPACITY.

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES**1. PROCESS CODES:**

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZ. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

NOTE: Photocopy this page before completing it if you have more than 26 wastes to list.

380

5851 W. 73rd St.

continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

1LT 1800 10340

S		EPA I.D. NO. (enter from page 1)	T/A	C
F	I	L D 0 0 4 1 6 3 2 8 3		6

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility (*see instructions for more detail*).

VI. PHOTOGRAPHS

All existing facilities must include photographs (*aerial or ground-level*) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (*see instructions for more detail*).

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)				LONGITUDE (degrees, minutes, & seconds)			
41	45	29	N	87	46	08	E
65 66	67 68	69 71		72 74	75 76	77 78	

VIII. FACILITY OWNER

XX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER															2. PHONE NO. (area code & no.)																				
C E															<div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> <div></div> </div>																				
13 15															58 56 - 58 59 - 61 62 - 65																				
3. STREET OR P.O. BOX															4. CITY OR TOWN															5. ST.			6. ZIP CODE		
C F															C G																				
13 16															48 15 16															40 41 42			47 - 51		

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
J.R. Klusendorf Vice President/Treas		November 13, 1980

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
-------------------------	--------------	----------------

Continued from page 2.

NOTE: Photocopy this page before completing

you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)													FOR OFFICIAL USE ONLY												
WIL0004160283													W DUP												
DESCRIPTION OF HAZARDOUS WASTES (continued)													D. PROCESSES												
LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)				B. ESTIMATED ANNUAL QUANTITY OF WASTE				C. UNIT OF MEASURE (enter code)		1. PROCESS CODES (enter)								2. PROCESS DESCRIPTION (if a code is not entered in D(1))						
	23	24	25	26	27	28	29	30	31	32	27	28	29	27	28	29	27	28	29						
1	U	0	3	1	80				Y		T	0	4							All three wastes listed may					
2	U	1	4	0																be included in main waste					
3	U	1	9	0																stream singly or all together					
4																				at a given time.					
5																									
6																									
7																									
8																									
9																									
10																									
11																									
12																									
13																									
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23																									
24																									
25																									
26																									

254 x

5851 W. 73rd Street
ADDENDUM TO RCRA PERMIT OF 11/13/80

Continued from the front.

V. DESCRIPTION OF HAZARDOUS WASTES (continued)
USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

1LT180010340

EPA I.D. NO. (enter from page 1)

I	D	0	0	4	1	6	3	2	8	3	T/A	C
1	2	3	4	5	6	7	8	9	10	11	12	13

VI. FACILITY DRAWING

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

VII. PHOTOGRAPHS

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

VIII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)

4	1	4	5	2	9	N
65	66	67	68	69	70	71

LONGITUDE (degrees, minutes, & seconds)

8	7	4	6	0	8	E
72	73	74	75	76	77	78

IX. FACILITY OWNER

☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code & no.)

3. STREET OR P.O. BOX

4. CITY OR TOWN

5. ST.

6. ZIP CODE

X. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

C. DATE SIGNED

J.R. Klusendorf Vice President/Treas.

November 18, 1980

XI. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)

B. SIGNATURE

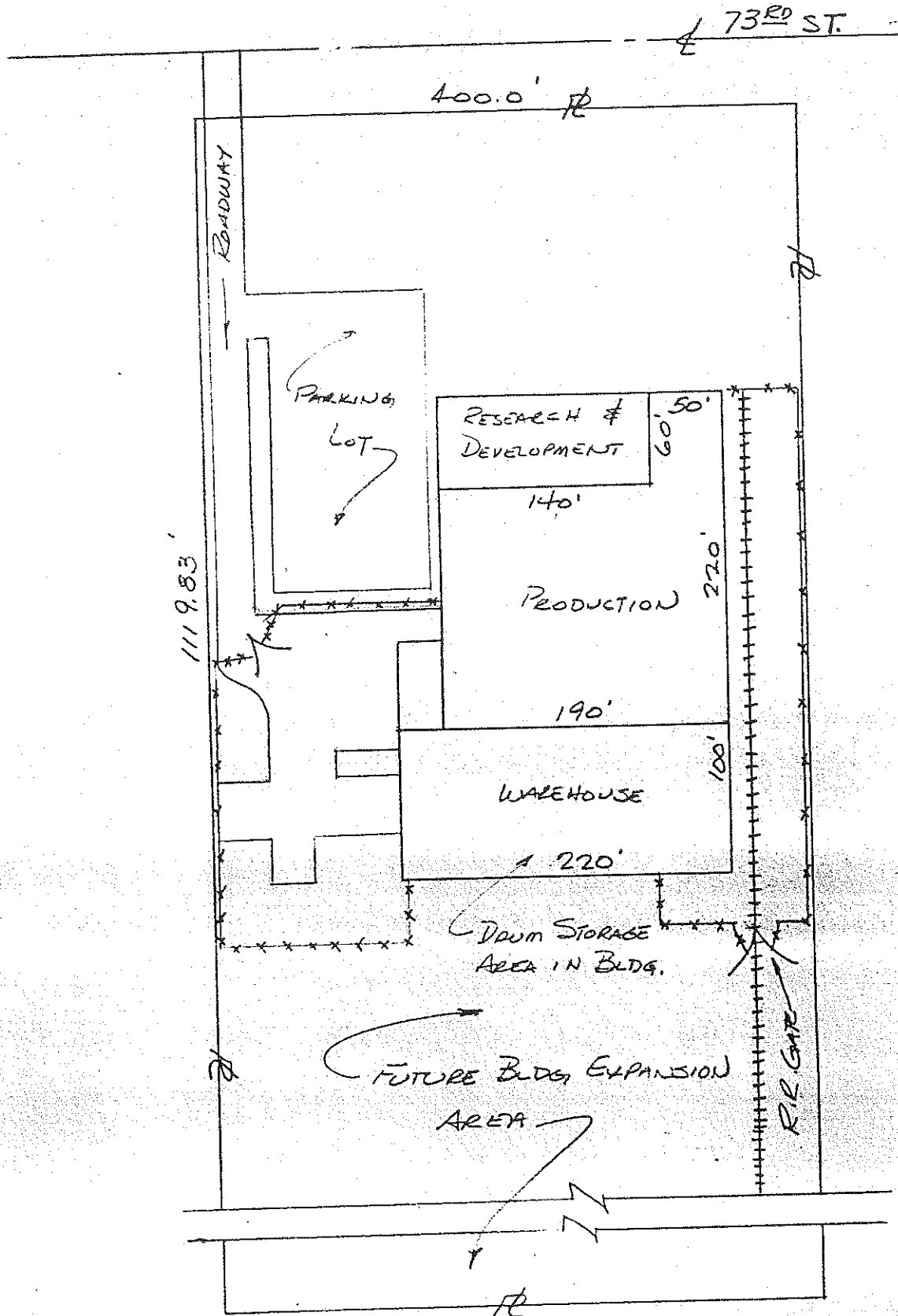
C. DATE SIGNED

Continued from page 4.

V. FACILITY DRAWING (see page 4)

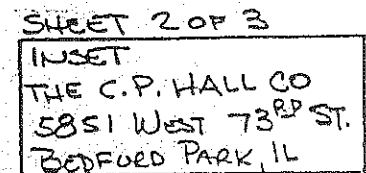
EPA I.D. No. ILD0004163783

254



SCALE 1" = 10'-0"

THE C.P. HALL CO
 5851 WEST 73RD ST
 BEDFORD PARK, IL 60638



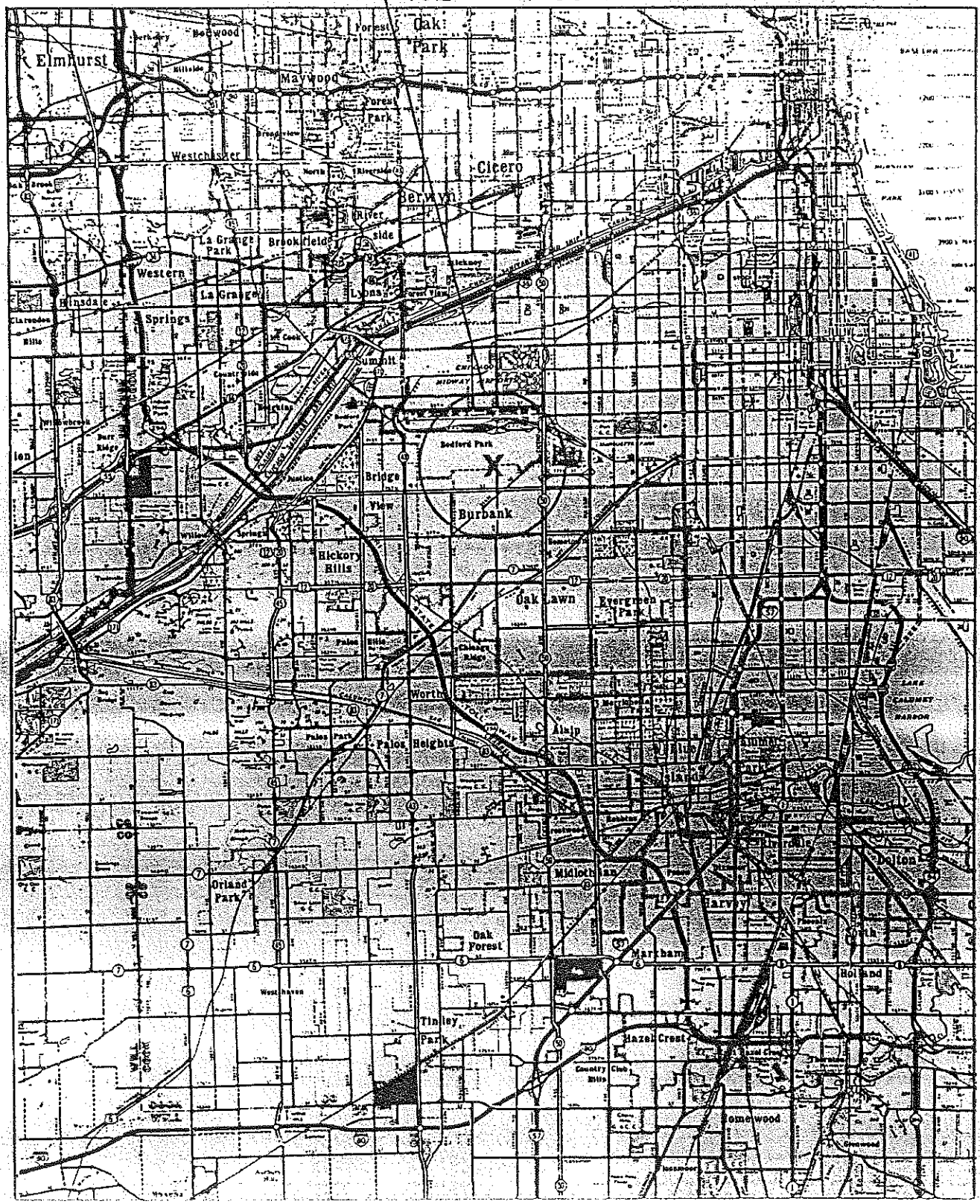
ScmE 117800

SHEET 1 OF 3

Bedford Park Area

LOCATION MAP
THE C. P. HALL CO.
BEDFORD PARK, IL
- SEE SHEET 3
FOR INSET - 7300 S. CENTRAL
- SEE SHEET 2
FOR INSET - 5851 W. 73RD
SCALE 1:142,000

5851 W. 73RD Street
ADDENDUM TO RCRA PERMIT OF 11/13/80





CONTINUE ON REVERSE

continued from the front.

I. PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.

All waste streams in plant including all floor drains, rain water on Tank Car and Tank Truck pads, and sinks in laboratories and plant areas are all collected to a sump. The waste water is pumped to a tank for oil skimming which goes to a holding tank. The main effluent then goes to a pH adjustment tank and then to a dissolved air flotation unit where flocculants are added. The skim is removed to a rotary vacuum filter. The treated water from the DAF unit goes to the MSD sewer. The effluent from the rotary vacuum filter goes back through the entire treatment cycle. The sludge is removed by permit to a landfill.

DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE
POUNDS	P
TONS	T

METRIC UNIT OF MEASURE	CODE
KILOGRAMS	K
METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

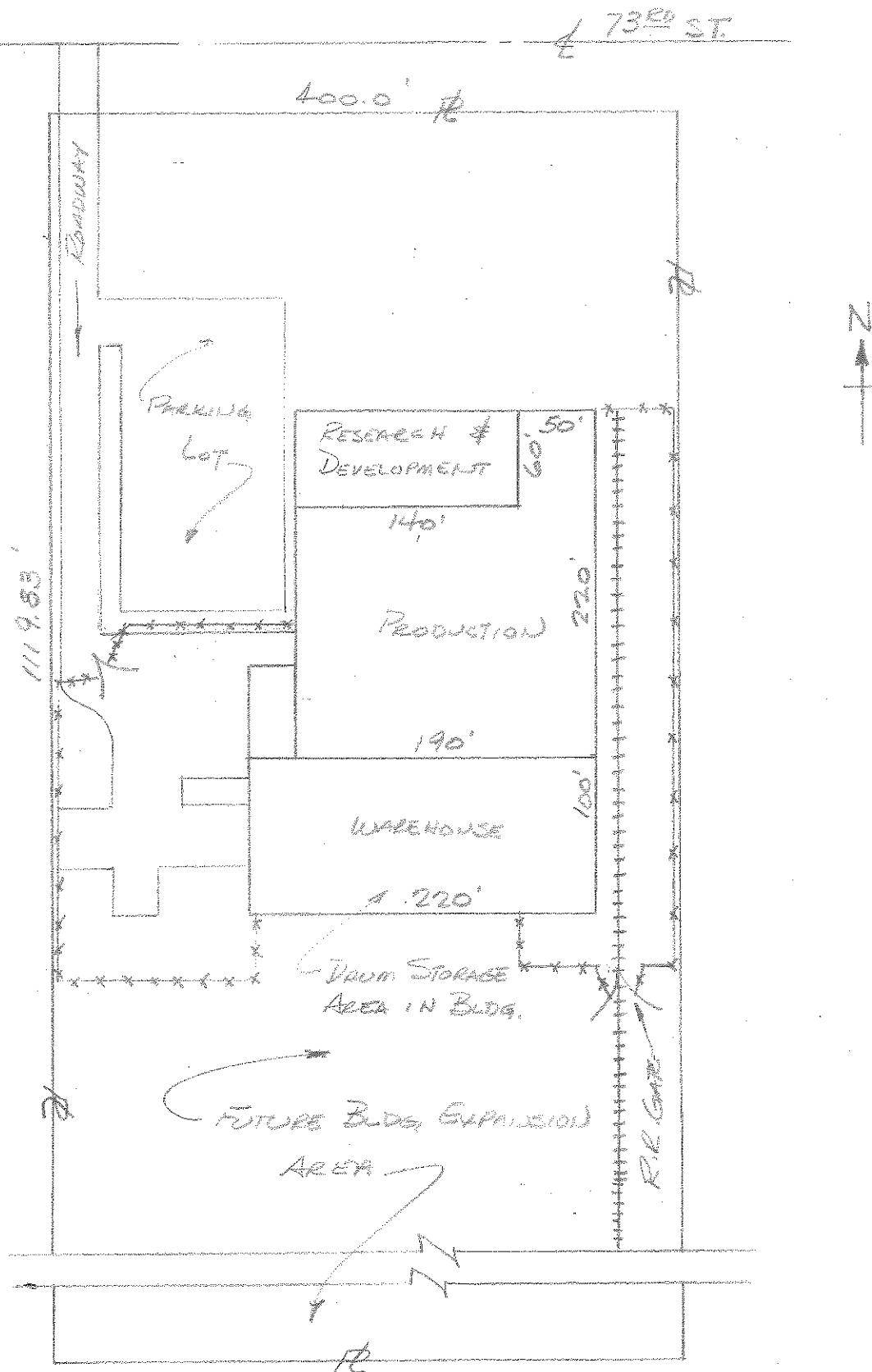
SAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
-1	K 0 5 4	900	P	T 0 3 D S 0	
-2	D 0 0 2	400	P	T 0 3 D S 0	
-3	D 0 0 1	100	P	T 0 3 D S 0	
-4	D 0 0 2				included with above

V. FACILITY DRAWING (see page 4)

EPA I.D. No. IL0004163283

380



SCALE 1" = 10'-0"

THE C.P. HALL CO
5851 WEST 73RD ST
BEDFORD PARK, IL 60638

**C.2 Compliance/
Enforcement**

311 SOUTH WACKER DRIVE
SUITE 4700
CHICAGO, ILLINOIS 60606



THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE 1-(312) 554-7400
FAX 1-(312) 554-7499
www.cphall.com

October 15, 2002

Mr. Robert Dean Smith
United States Environmental Protection Agency - Region 5
77 West Jackson Boulevard - DE-9J
Chicago, IL 60604

RE: Response to September 19, 2002 Notice of Violation ("NOV")
Facility ID No.: ILT180010340

Dear Mr. Smith:

On September 26, 2002 The C. P. Hall Company received a NOV from your office based on a compliance evaluation inspection that was conducted on February 1, 2002 at our 5851 W. 73rd Street Manufacturing Facility in Bedford Park, Illinois.

We appreciate that you have brought certain matters to our attention through the NOV. The C.P. Hall Company has come into compliance with respect to the violations identified in the NOV. In particular, The C.P. Hall Company has already undertaken and performed the following corrective action:

- Copies of all training records are kept on-site.
- Copies of all Land Disposal Restriction forms are kept on site with the corresponding manifest.

Employees responsible for maintenance of records have been instructed on the importance of the record retention requirements and we do not expect any deficiencies in the future.

We hope that these actions will satisfy the Agency and no further action on this NOV will be required. The C. P. Hall Company is proud of its continuous compliance with all regulations and it understands the importance of remaining in compliance with those regulations. If you have any questions or need additional information, please contact me at 312-554-7422.

Sincerely,
THE C. P. HALL COMPANY

April A. Cesaretti
Regulatory Affairs Manager



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

SEP 19 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Pat Mullin
Director of Engineering
C.P. Hall Company
5851 West 73rd Street
PO Box 910
Bedford Park, Illinois 60499-0910

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILT180010340

Dear Mr. Mullin:

On February 1, 2002, representatives of the United States Environmental Protection Agency (U.S. EPA) inspected C.P. Hall Company located in Bedford Park, Illinois (the "facility" or "CPH"). The purpose of the inspection was to evaluate the facility's compliance with the Standards Applicable to Generators of Hazardous Waste set forth at 35 I.A.C. Part 722 and 40 CFR part 262, respectively. Enclosed please find a copy of our inspection report dated June 19, 2002.

Based on the February 1, 2002 inspection, we have determined that C.P. Hall is violating the following requirements.

1. I.A.C. 703.121(a)(1)/I.A.C. 722.134(d)[40 CFR 270.1(c)/40 CFR 262.34(a)(4)]. CPH operated a hazardous waste storage facility without the required RCRA permit by failing to comply with the following condition:

I.A.C. 722.134(a)[40 CFR 262.34(a)(4)/40 CFR 265.16(d)]. CPH failed to maintain training records on-site as required. The records were transferred to the site after the inspection.

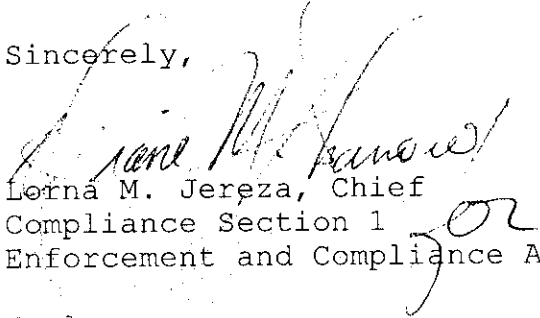
I.A.C. 722.134(a)[40 CFR 262.34(a)(4)/40 CFR 268.7(a)(8)]. CPH failed to maintain a copy of an LDR form on-site as

required. The form was obtained by the generator and provided to EPA on February 5, 2002.

According to Section 3008(a) of the Resource Conservation and Recovery Act (RCRA), U.S. EPA may issue an order assessing a civil penalty for any past or current violation requiring compliance immediately or within a specified time period. Although this letter is not such an order, we request that you submit a written response to the violations cited above within 30 days of receipt of this letter. The response should document the actions, if any, which you have taken since the inspection to comply with the above requirements. Submit your response to Robert Dean Smith, United States Environmental Protection Agency, Region 5, 77 West Jackson Boulevard, DE-9J, Chicago, Illinois 60604.

If you have any questions regarding this matter feel free to contact Robert Dean Smith of my staff at (312) 886-7568.

Sincerely,


Lorna M. Jereza, Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

RCRA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: COMPLIANCE EVALUATION INSPECTION (CEI)
Facility: C.P. Hall Company
5851 West 73rd Street
PO Box 910
Bedford Park, Illinois 60499-0910
Facility ID Number: ILT180010340
Date of Inspection: February 1, 2002
EPA Inspector: Patrick F. Kuefler
312/353-6268
Janet Haff
312/353-7923
Facility Reps.: Pat Mullin
Director of Engineering
(708) 594-5080
Jeff Jaworek
Plant Manager
(708) 594-1185
April Cesaretti
Regulatory Affairs
(312) 554-7434
Report Prepared by: Patrick F. Kuefler
Date: June 19, 2002

RCRA Compliance Evaluation Inspection

Introduction

The U.S. Environmental Protection Agency (EPA) conducted a RCRA CEI at C.P. Hall Company (CPH) Bedford Park, Illinois on February 1, 2002. I was accompanied by Janet Haff of EPA who collected information related to CPH's waste minimization efforts. During the inspection, I interviewed Pat Mullin, Director of Engineering, Jeff Jaworek, Plant Manager, and April Cesaretti, Regulatory Affairs. Ms. Cesaretti provided most of the information related to hazardous waste management at the site and accompanied EPA on the site inspection of the facility.

The facility produces over 120 different polymeric and monomeric esters. According to State and EPA records and documents reviewed during the inspection, the site is a Large Quantity Generator (LQG) of hazardous waste.

The inspection commenced at approximately 9:15 AM with an interview of Mr. Mullin and Mr. Jaworek concerning the business operations, the types of hazardous waste, and quantity of hazardous waste that is generated by the facility. However, Mr. Mullin and Mr. Jaworek would not provide plant access or substantive documents related to hazardous waste management at the site until Ms. Cesaretti arrived on-site over an hour later.

After Ms. Cesaretti arrived on-site, the EPA inspectors and the CPH personnel went on a site tour of the facility which included walk-through of several process and material storage areas. The site tour generally following the production process.

Facility Operation, Processes, and Products

CPH manufactures a variety of esters for use in products including flexible PVC, gaskets, coatings, and adhesives. Over 120 different monomeric and polymeric esters are made on-site using a batch process. The company has the primary Standard Industrial Classification Codes (SIC) of 2869.

CPH uses 5 reactor trains utilizing four 20,000 pound and one 8,000 pound reactors. The reactor trains typically involve the use of a weight tank, a heat jacketed reactor, and a finishing tank which is used for inserting additives or is used for product filtration.

The primary hazardous waste streams are methonal and acetone/butanol waste, both are classified as D001 ignitable hazardous wastes. The quantities shipped during 2001 would classify the facility as a large quantity generator of hazardous waste.

Document Review

in addition to the physical site inspection, EPA requested several documents related to hazardous waste management including the container inspection records, training records, manifests, Annual Report, waste analysis records, and the contingency plan. No discrepancies were noted in the manifests, inspection records, or contingency plan. Training records for those individuals that are involved with hazardous waste management were not kept on-site as required but instead were maintained at the headquarters office in downtown Chicago. The records were provided at after the inspection by fax. No discrepancies were noted in the record review.

A review of 2001 hazardous waste manifests found no manifest discrepancies with the exception that one accompanying Land Disposal Restriction form was not available on-site during the inspection. The form was later located and provided to EPA on February 5, 2002.

Finally, analyses for two waste streams, WWT Sludge and Filter cake, could not be located on-site during the inspection. Copies of the analyses were provided to EPA on February 4, 2002.

Observations

1. I.A.C. 703.121(a)(1)/I.A.C. 722.134(d)[40 CFR 270.1(c)/40 CFR 262.34(a)(4)], CPH operated a hazardous waste storage facility without the required RCRA permit by failing to comply with the following conditions:

I.A.C. 722.134(a)[40 CFR 262.34(a)(4)/40 CFR 265.16(d)], CPH failed to maintain training records on-site as required. The records were transferred to the site after the inspection ~~and~~ ; and.

I.A.C. 722.134(a)[40 CFR 262.34(a)(4)/40 CFR 268.7(a)(8)], CPH failed to maintain a copy of LDR form on-site as required. The form was obtained by the generator and provided to EPA on February 5, 2002.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

DE-9J

SEP 19 2002

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Pat Mullin
Director of Engineering
C.P. Hall Company
5851 West 73rd Street
PO Box 910
Bedford Park, Illinois 60499-0910

Re: Notice of Violation
Compliance Evaluation Inspection
EPA I.D. No.: ILT180010340

Dear Mr. Mullin:

On February 1, 2002, representatives of the United States Environmental Protection Agency (U.S. EPA) inspected C.P. Hall Company located in Bedford Park, Illinois (the "facility" or "CPH"). The purpose of the inspection was to evaluate the facility's compliance with the Standards Applicable to Generators of Hazardous Waste set forth at 35 I.A.C. Part 722 and 40 CFR part 262, respectively. Enclosed please find a copy of our inspection report dated June 19, 2002.

Based on the February 1, 2002 inspection, we have determined that C.P. Hall is violating the following requirements.

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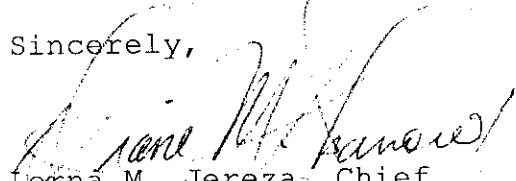
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If you have any questions regarding this matter feel free to contact Robert Dean Smith of my staff at (312) 886-7568.

Sincerely,


Lorna M. Jereza, Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosure

RCRA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: COMPLIANCE EVALUATION INSPECTION (CEI)
Facility: C.P. Hall Company
5851 West 73rd Street
PO Box 910
Bedford Park, Illinois 60499-0910
Facility ID Number: ILT180010340
Date of Inspection: February 1, 2002
EPA Inspector: Patrick F. Kuefler
312/353-6268
Janet Haff
312/353-7923
Facility Reps.: Pat Mullin
Director of Engineering
(708) 594-5080
Jeff Jaworek
Plant Manager
(708) 594-1185
April Cesaretti
Regulatory Affairs
(312) 554-7434
Report Prepared by: Patrick F. Kuefler
Date: June 19, 2002

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bcc: File Copy
 Author's Copy
 Branch Copy
 Section Copy

ENFORCEMENT AND COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	COMPLIANCE SECTION 1 SECTION CHIEF	COMPLIANCE SECTION 2 SECTION CHIEF	CA SECTION SECTION CHIEF	ECAB BRANCH CHIEF
1003 09/16/02	DIS for LNT w/coord. 9/16/02			

RCRA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5

Purpose: COMPLIANCE EVALUATION INSPECTION (CEI)

Facility: C.P. Hall Company
5851 West 73rd Street
PO Box 910
Bedford Park, Illinois 60499-0910

Facility ID Number: ILT180010340

Date of Inspection: February 1, 2002

EPA Inspector: Patrick F. Kuefler
312/353-6268

Janet Haff
312/353-7923

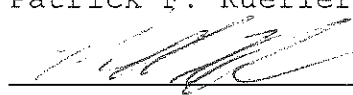
Facility Reps.: Pat Mullin
Director of Engineering
708/594-5080

Jeff Jaworek
Plant Manager
708/594-1185

April Cesaretti
Regulatory Affairs
312/554-7434

Report Prepared by: Patrick F. Kuefler

Date:


6/19/02

RCRA Compliance Evaluation Inspection

Introduction

On February 1, 2002, I, Patrick Kuefler of the U.S. Environmental Protection Agency (EPA) conducted a RCRA Compliance Evaluation Inspection (CEI) at C.P. Hall Company (CPH or facility) located in Bedford Park, Illinois. I was accompanied by Janet Haff of the Pollution Prevention and Program Initiative Section of EPA who collected information related to CPH's waste minimization efforts. During the inspection, I interviewed Pat Mullin, Director of Engineering, Jeff Jaworek, Plant Manager, and April Cesaretti, Regulatory Affairs who provided most of the information related to hazardous waste management at the site and accompanied us on the site inspection of the facility. The facility makes over 120 different polymeric and monomeric esters. According to State and EPA records and documents reviewed during the inspection, the site is a Large Quantity Generator (LQG) of hazardous waste.

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The primary hazardous waste streams are methanol and acetone/butanol waste which are both classified as D001 ignitable hazardous wastes. The quantities shipped during 2001 would classify the facility as a large quantity generator of hazardous waste. After Ms. Cesaretti arrived on-site the group went on a site tour of the facility which included a walk-through of

several processes and material storage areas generally following the production process.

Document Review

In addition to the physical site inspection, EPA requested several documents related to hazardous waste management including the container inspection records, training records, manifests, Annual Report, waste analysis records, and the contingency plan. No discrepancies were noted in the manifests, inspection records, or contingency plan. Training records for those individuals that are involved with hazardous waste management were not kept on-site as required but instead were maintained at the headquarters office in downtown Chicago. The records were provided to us after the inspection by facimile (**See Attachment A**). No discrepancies were noted.

A review of 2001 hazardous waste manifests found no manifest discrepancies with the exception of one accompanying Land Disposal Restriction form that was not available on-site during the inspection. The form was later located and provided on February 5, 2002 (**See Attachment B**). Finally, analyses for two waste streams consisting of Waste Water Treatment Sludge and Filter cake could not be located on-site during the inspection. Copies of the analyses were provided on February 4, 2002 (**See Attachment C**).

Findings

1. I.A.C. 703.121(a)(1)/I.A.C. 722.134(d)[40 CFR 270.1(c)/40 CFR 262.34(a)(4)], CPH operated a hazardous waste storage facility without the required RCRA permit by failing to comply with the following condition:

I.A.C. 722.134(a)[40 CFR 262.34(a)(4)/40 CFR 265.16(d)], CPH failed to maintain training records on-site as required. The records were transferred to the site after the inspection.

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Attachments

- A. Training Records
- B. Land Disposal Restriction form
- C. WWT Sludge and Filter cake
analyses



311 SOUTH WACKER DRIVE
SUITE 4700
CHICAGO, ILLINOIS 60606

THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE 1-(312) 554-7400
FAX 1-(312) 554-7499
www.cphall.com

February 4, 2002

Mr. Patrick Kuefler
Waste, Pesticides and Toxics Division
US EPA
FAX: 312-353-4342

RE: Follow-up Documents from Feb. 1, 2002 Inspection
The C. P. Hall Company

Dear Mr. Kuefler:

Per your request at our recent inspection attached are the following documents:

- Waste Analysis Records for - WWT Sludge and Filter Cake

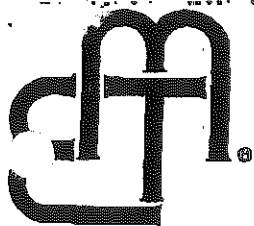
The Land Disposal Restriction Form for the Methanol will arrive under separate cover.

You also wanted to know what was on the paper towels that were in the trash can in our R&D laboratory #1. After speaking with the chemist who works in the laboratory, he stated that it was water from washing his hands in the sink located in the laboratory. Solvent soaked rags / paper towels are not generated in the laboratories unless there is a spill. Employees know that rags / paper towels soaked in solvents are not acceptable to be disposed of in the trashcan and they must be disposed of separately. The employees adhere to this policy.

Again, I apologize for the delay in getting to the plant on Friday - I didn't have a car and had to track one down. In the future, we will keep copies of the documents on site. If I can be of further assistance, please let me know - 312-554-7422.

Sincerely,
THE C.P. HALL COMPANY

April A. Cesaretti
Regulatory Affairs Manager



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735

LABORATORY REPORT

C.P. Hall Company
1300 South Central Avenue
Bedford Park, IL 60499-0608

190488
Page 1 of 1

Sample Description: Sludge *WWT Sludge*
Sample No.: 057056

Report Date: 12/10/98
Sample Received: 11/23/98
Date Analyzed: 12/8/98

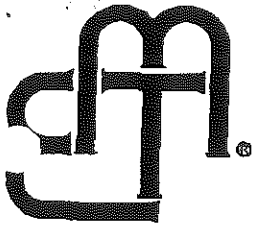
	Concentration Found In		Method Detection Limit (MDL) ug/kg (ppb)	Quantitation Limit ug/kg (ppb)
	Sample (ppb)	Blank (ppb)		
PCB 1221	<1000	<0.08	1000	2000
PCB 1232	<1000	<0.08	1000	2000
PCB 1018 (1242)	<1000	<0.08	1000	2000
PCB 1248	<1000	<0.08	1000	2000
PCB 1254	<1000	<0.08	1000	2000
PCB 1260	<1000	<0.08	1000	2000
(Total PCB)	<1000	<0.08	-----	-----

All results expressed as ppb unless otherwise indicated.

Methods performed according to NS-146, "Test Methods for Evaluating Solid Waste".

The contents of this report apply only to the sample analyzed. No duplication of this report is allowed except in its entirety.

LABORATORY DIRECTOR



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
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LABORATORY REPORT

C.P. Ball Company
7300 South Central Avenue
Bedford Park, IL 60499-0608

190488-A
Page 1 of 2

Sample Description: Sludge

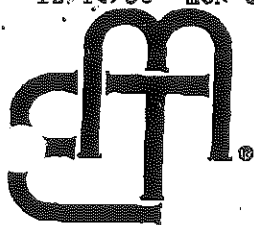
Report Date: 12/10/98
Sample Received: 11/23/98
Date Analyzed: 12/2/98

SOVENTS UNDER CHEMICAL
NUMBERS P001 P002 P003 P004 P005

	Sample #057056	Blank	Detection Limit
P001 Tetrachloroethylene	<100	<0.005	0.005
Trichloroethylene	<100	<0.005	0.005
Methylene Chloride	<100	<0.005	0.005
1,1,1 - Trichloroethane	<100	<0.005	0.005
Carbon Tetrachloride	<100	<0.005	0.005
P002 Tetrachloroethylene	<100	<0.005	0.005
Methylene Chloride	<100	<0.005	0.005
Trichloroethylene	<100	<0.005	0.005
1,1,1 - Trichloroethane	<100	<0.005	0.005
Chlorobenzene	<100	<0.005	0.005
1,1,2-Trichloro-			
1,2,2 - Trifluoroethane	<100	<0.005	0.005
Ortho - Dichlorobenzene	<100	<0.005	0.005
Trichlorofluoromethane	<100	<0.005	0.005
1,1,2 - Trichloroethane	<100	<0.005	0.005
P003 Xylenes	250	<0.005	0.005
Acetone	<100	<0.005	0.005
Ethyl Acetate	<100	<0.005	0.005
Ethyl Benzene	<100	<0.005	0.005

All results expressed as ppm unless otherwise stated.

LABORATORY DIRECTOR



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735

LABORATORY REPORT

C.P. Hall Company
7300 South Central Avenue
Bedford Park, IL 60499-0608

190488-A
Page 2 of 2

Sample Description: Sludge

Report Date: 12/10/98
Sample Received: 11/23/98
Date Analyzed: 12/2/98

SOLVENTS UNDER GENERIC

NUMBERS F001 F002 F003 F004 F005

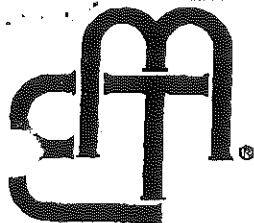
	Sample #057056	Blank	Detection Limit
Ethyl Ether	<100	<0.005	0.005
Methyl Isobutyl Ketone	<100	<0.005	0.005
n-Butyl Alcohol	<100	<0.005	0.005
Cyclohexanone	<100	<0.005	0.005
Methanol	<100	<0.01	0.01
F004 Cresols or Cresylic Acid	<100	<0.005	0.005
Nitrobenzene	<100	<0.005	0.005
F005 Toluene	<100	<0.005	0.005
Methyl Ethyl Ketone	<100	<0.005	0.005
Carbon Disulfide	<100	<0.005	0.005
Isobutanol	<100	<0.005	0.005
Cyridine	<100	<0.005	0.005
2 - Ethoxyethanol	<100	<0.01	0.01
Benzene	<100	<0.005	0.005
2 - Nitropropane	<100	<0.005	0.005

All units expressed as ppm unless otherwise stated.

Methods performed according to SW-846 "Test Methods for Evaluating Solid Waste".

The contents of this report apply only to the sample analyzed. No duplication of this report is allowed except in its entirety.

LABORATORY DIRECTOR



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735

LABORATORY REPORT

C.P. Hall Company
7300 South Central Avenue
Bedford Park, IL 60499-0608

190488-R
Page 1 of 1

Sample Description: Sludge
Sample No.: 057056

Report Date: 12/10/98
Sample Received: 11/23/98
Date Analyzed: 12/2/98

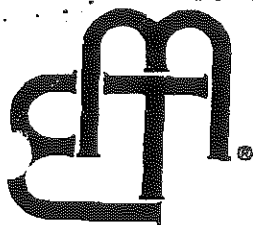
Compound	Concentration Found In		Method Detection Limit (MDL)	Regulatory Limit
	Sample	Blank		
1. Benzene	<0.25	<0.01	0.01	0.50
2. Carbon Tetrachloride	<0.25	<0.01	0.01	0.50
3. Chlorobenzene	<50.0	<0.01	0.01	100.00
4. Chloroform	<3.0	<0.01	0.01	6.00
5. o-Cresol	<100.0	<0.01	8.7	200.00
6. m-Cresol	<100.0	<0.01	8.7	200.00
7. p-Cresol	<100.0	<0.01	8.7	200.00
Total Cresol	<100.0	<0.01	8.7	200.00
8. 1,4-Dichlorobenzene	<3.75	<0.01	0.01	7.50
9. 1,2-Dichloroethane	<0.25	<0.01	0.01	0.50
10. 1,1-Dichloroethene	<0.35	<0.01	0.01	0.700
11. 2,4-Dinitrotoluene	<8.7	<0.01	8.7	0.13
12. Hexachlorobenzene	<8.7	<0.01	8.7	0.13
13. Hexachloro-1,3-butadiene	<8.7	<0.01	8.7	0.50
14. Hexachloroethane	<8.7	<0.01	8.7	3.00
15. Methyl Ethyl Ketone	<100.0	<0.01	0.01	200.00
16. Nitrobenzene	<8.7	<0.01	8.7	3.00
17. Pentachlorophenol	<50.00	<0.01	8.7	100.00
18. Pyridine	<8.7	<0.01	8.7	5.00
19. Tetrachloroethylene	<0.35	<0.01	0.01	0.70
20. Trichloroethylene	<0.25	<0.01	0.01	0.50
21. 2,4,6-Trichlorophenol	<200.00	<0.01	8.7	400.00
22. 2,4,6-Trichlorophenol	<8.7	<0.01	8.7	2.00
23. Vinyl Chloride	<0.10	<0.01	0.01	0.20

2,5-phenol and 4,4'-tetraphenyl surrogates are out of range due to interference with sample matrix. All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test methods for Evaluating Solid Waste". Analysis performed on Extract from TCLP.

The contents of this report apply only to the sample analyzed. No duplication of this report is allowed except in its entirety.

LABORATORY DIRECTOR



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735

LABORATORY REPORT

C.P. Hall Company
7300 South Central Avenue
Bedford Park, IL 60499-0608

190488-C
Page 1 of 1

Report Date: 12/10/98
Sample Received: 11/23/98

Sample Description: Sludge
Sample No.: 057056

Analyte	Result	Date Completed	By	Method
Ash content	2.23%	12/09/98	RG	2540R(2)
Closed Cup Flash Point	>180.°F	12/03/98	SK	D93-85(21)
Water Compatibility	NO REACTION	12/03/98	AK	D5058-90(21)
Chloride	<5.0	12/02/98	TM	D5049-90(21)
Odor of sample	SOLVENT	12/03/98	AR	D4979-89(21)
Paint Filter	FAIL	12/03/98	AR	9095(6)
Phenolics	<10	12/02/98	TM	9065(6)
Physical Appearance	LIGHT BROWN SLUDGE	12/03/98	AR	D4979-89(21)
Total Solids	37.8%	12/09/98	RG	2540R(2)
Sulfide	<10	12/01/98	RG	D4978-89(21)
pH (10% Solution)	6.13units	12/03/98	AR	9045(6)

Analysis Performed on TCLP Extract

Arsenic	<0.200	12/03/98	NPS	7060A(6)
Barium	<1.00	12/03/98	MG	6010B(6)
Cadmium	<0.80	12/03/98	MG	6010B(6)
Chromium	2.27	12/03/98	MG	6010B(6)
Copper	<2.00	12/03/98	MG	6010B(6)
Lead	<3.50	12/03/98	MG	6010B(6)
Mercury	<0.0300	12/03/98	MG	6010B(6)
Nickel	<4.00	12/03/98	ML	7470A(6)
Selenium	<0.200	12/03/98	MG	6010B(6)
Silver	<4.00	12/03/98	NPS	7740(6)
Zinc	<2.00	12/03/98	MG	6010B(6)

All results expressed as ppm unless otherwise indicated

NOTE on Water Compatibility: PARTIALLY FLOATS, PARTIALLY SINKS
Boiling time exceeded for Ash content
Boiling time exceeded for Total Solids
Boiling time exceeded for Sulfide
Boiling time exceeded for Reactive Sulfide

(1) Analysis performed using "Standard Methods for the Examination of Wastewater", 19th Edition
(2) Analysis performed using ASTM Method
(3) Methods performed according to SW-846 "Test Methods for Evaluating Solid Waste"

The contents of this report apply to the sample analyzed. No duplication of this report is allowed except in its entirety

LABORATORY DIRECTOR



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735

LABORATORY REPORT

C.P. Hall Company
7300 South Central Avenue
Bedford Park, IL 60499-0608

207684-A
page 1 of 1

Sample Description: Solid Grab - FILTER CAKE
Sample No.: 087536

Report Date: 11/17/99
Sample Received: 11/09/99
Date Sampled: 11/09/99
Date Analyzed: 11/12/99

Compounds	Concentration Found In		Reporting Limit	Regulatory Limit
	Sample	Blank		
1. Benzene	<0.25	<0.01	0.01	0.50
2. Carbon Tetrachloride	<0.25	<0.01	0.01	0.50
3. Chlorobenzene	<50.0	<0.01	0.01	100.00
4. Chloroform	<3.0	<0.01	0.01	6.00
5. o-Cresol	<100.0	<0.01	0.01	200.00
6. m-Cresol	<100.0	<0.01	0.01	200.00
7. p-Cresol	<100.0	<0.01	0.01	200.00
Total Cresol	<100.0	<0.01	0.01	200.00
8. 1,4-Dichlorobenzene	<3.75	<0.01	0.01	7.50
9. 1,2-Dichloroethane	<0.25	<0.01	0.01	0.50
10. 1,1-Dichloroethene	<0.35	<0.01	0.01	0.700
11. 2,4-Dinitrotoluene	<0.07	<0.01	0.01	0.13
12. Hexachlorobenzene	<0.07	<0.01	0.01	0.13
13. Hexachloro-1,3-butadiene	<0.25	<0.01	0.01	0.50
14. Hexachloroethane	<1.50	<0.01	0.01	3.00
15. Methyl Ethyl Ketone	<100.0	<0.01	0.01	200.00
16. Nitrobenzene	<1.00	<0.01	0.01	2.00
17. Pentachlorophenol	<50.00	<0.01	0.01	100.00
18. Pyridine	<2.50	<0.01	0.01	5.00
19. Tetrachloroethylene	<0.35	<0.01	0.01	0.70
20. Trichloroethylene	<0.25	<0.01	0.01	0.50
21. 2,4,5-Trichlorophenol	<200.00	<0.01	0.01	400.00
22. 2,4,6-Trichlorophenol	<1.00	<0.01	0.01	2.00
23. Vinyl Chloride	<0.10	<0.01	0.01	0.20

All results expressed as ppm unless otherwise indicated.

Methods performed according to SW-846, "Test methods for Evaluating Solid Waste".

Analysis performed on Extract from TCLP.

The contents of this report apply only to the sample analyzed. No duplication of this report is allowed except in its entirety.

Leah E. Fisher



ENVIRONMENTAL MONITORING AND TECHNOLOGIES, INC.

8100 North Austin Avenue
Morton Grove, Illinois 60053-3203
847-967-6666
FAX: 847-967-6735

LABORATORY REPORT

C.P. Hall Company
7300 South Central Avenue
Bedford Park, IL 60499-0608

207684

page 1 of 1

Report Date: 11/17/99
Sample Received: 11/09/99
Date Sampled: 11/09/99

Sample Description: Solid Grab - FILTER CAKE
Sample No.: 087536

Analyte	Result	Date Completed	By	Method
Reactive Cyanide	<0.50	11/10/99	TM	7.3.3(6)
Extractable Organic Halogens	10.5	11/11/99	RG	9020A(6)
Open Cup Flash Point	>180.°F	11/12/99	WK	D92-90(21)
Paint Filter	PASS	11/12/99	WK	9095(6)
Total Phenolics	1.32	11/10/99	TM	9065(6)
Total Solids	99.6%	11/12/99	AF	2540B(2)
Reactive Sulfide	<10.0	11/14/99	RG	7.3.4(6)
pH (10% Solution)	6.79units	11/12/99	WK	9045(6)

Analysis Performed on TCLP Extract

Arsenic	<0.200	11/12/99	GF	6010B(6)
Barium	<0.50	11/12/99	GF	6010B(6)
Cadmium	<0.02	11/12/99	GF	6010B(6)
Chromium	<0.10	11/12/99	GF	6010B(6)
Lead	<0.20	11/12/99	GF	6010B(6)
Mercury	<0.0100	11/13/99	AG	7470A(6)
Selenium	<0.200	11/12/99	GF	6010B(6)
Silver	<0.20	11/12/99	GF	6010B(6)

All results expressed as ppm unless otherwise indicated

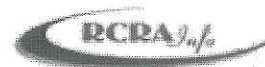
- (6) Methods performed according to SW-846 "Test Methods for Evaluating Solid Waste"
- (21) Analysis performed using ASTM Method
- (3) Analysis performed using "Standard Methods for the Examination of Wastewater", 19th Edition

The contents of this report apply to the sample analyzed. No duplication of this report is allowed except in its entirety

Cheryl W. Waid



CM&E - Handler Search



Enter the Handler ID you wish to search on:

Handler ID:

Search Cancel Clear

Your search has found 1 handler(s).

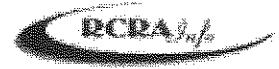
Search Results

Act Loc	Handler Name	EPA Id	Street No.	Street Address	City	State	Zip Code	County	Universes
IL	HALL C P CO THE	ILT180010340		5851 W 73RD ST	BEDFORD PARK	IL	60638	COOK	LQG ▼

URL: /CME/Handler_srch.asp



CM&E Evaluations List


HALL C P CO THE
BEDFORD PARK
ILT180010340

Select the Evaluation to process or choose the Add New Evaluation button below:

Your search has found 1 Evaluations.

Evaluations							Violations						
Act Loc	Seq #	Type	Date	Agency	Resp Person	Reason	Determined Date	Seq #	Type	Resp Agency	Class - Priority	Latest Sched RTC	Actual RTC
IL	001	CEI	8/16/1999	E	R5DFC		8/16/1999	0001	GOR	E	-		

Go To

URL: CME/CME_eval_main.asp



Update Evaluation



HALL C P CO THE

BEDFORD PARK

ILT180010340

Last Updated By: HQLSF

Last Updated On: 9/13/2000 8:56:04 AM

Location of Activity: IL

Evaluation sequence: 001

Evaluation Type: CEI - HQ - COMPLIANCE EVALUATION INSPECTION ON-SITE

Evaluation Date: 8/16/1999

Resp. Agency: E

Reason: Resp. Person: Suborganization: 05 - II - Evaluation Notes:

Did this evaluation find any violations?

- ☒ Yes, violations were found.
- ☐ No, violations were not found.
- ☐ Undetermined, Agency may still be determining whether violations existed.

[Cancel](#) [Coverage Areas](#) (optional) [Continue](#)

URL: /CME/CME_eval_addupd.asp

received by fax

Hazardous Waste Training
5851

I certify I have been trained in Hazardous Waste

Trainer: APRIL CESARETTI

Date: 9.14.01

	Name	Signature
9.14.01	1. Keith Kuhlman	Keith Kuhlman
10.14.01	2. Tina Hardy	Tina Hardy
11.14.01	3. Steve Simionow	Steve J. Simionow
V	4. Jean Zhang	Jean Zhang
	5. URVIL SHAM	Urvil Sham
	6. Marcus McNames	Marcus McNames
	7. Stephen O'Rourke	Stephen O'Rourke
11.19.01	8. KAMILA SIEMEZUCH	Kamil Siemczuch
	9. GERMAN TORRES	German Torres
	10. DRUANN JENNINGS	Druann Jennings
	11. BOB McMillin	Bob McMillin
	12.	
	13.	
	14.	
	15.	
	16.	
	17.	
	18.	
	19.	
	20.	
	21.	
	22.	
	23.	

Hazardous Waste Training
5851 Manufacturing and Technical Center Laboratory

Trainer: APRIL TRUSZKOWSKI

Date: 11/7/00

I, the undersigned, certify that I have been trained in Hazardous Waste handling

Name

Signature

1) English, John

Does not generate Hg, Waste

2) Gaita, Romulus

[Signature]

~~3) Hapak, Todd~~

~~4) Kuhlman, Keith~~

5) McMillin, Robert

Robert McMillin

6) McNames, Marcus

7) O'Rourke, Steve

Steve O'Rourke

8) Roth, Magda

Magda Roth

~~9) Semlow, Steve~~

Steve Semlow

10) Shah, Urvil

Urvil Shah

11) Siemzuch, Kamila

Kamila Siemzuch

12) Stefanisin, Kim

Kim Stefanisin

~~13) Torres, German~~

German Torres

~~14) Witkiewicz, Art~~

Art Witkiewicz

15) Yokoyama, Tom

Thomas W. Yokoyama

16) Zhang Jean

Jean Zhang

17)

Hazardous Waste Training

Manufacturing and Technical Center Production and Warehouse Personnel

Trainer: APRIL TRUSZKOWSKI

Date: NOV. 8, 1999 ; NOV. 9, 1999

	<u>Name</u>	<u>Signature</u>	<u>Job Title</u>
1)	Berningham, Bob	<i>Robert R Berningham</i>	Supervisor
2)	Cannon, Shawn	<i>Cannon, Shawn</i>	Checker
3)	Christoff, Randy	<i>Randy Christoff</i>	Operator
4)	Ferraro, Tony	<i>Tony Ferraro</i>	WHSE. MGR.
5)	Irman, Mike - medical	<i>Mike Irman</i>	CHIM OPER. COORDINATOR
6)	Jamnik, Jerry	<i>Jerry Jamnik</i>	Reduction
7)	Jaworek, Jeff	<i>Jeff Jaworek</i>	PROD MGR.
8)	Jennings, Dru	<i>Dru Jennings</i>	Warehouse
9)	Jones, Bob	<i>Robert Jones</i>	
10)	Mullin, Pat	<i>Pat Mullin</i>	Plant Manager
11)	O'Rourke, Rick	<i>Rick O'Rourke</i>	WHSE HANDLER
12)	Orr, Joe	<i>Joe Orr</i>	Prod.
13)	Petrosky, Bill	<i>William Petrosky</i>	Prod. Supv.
14)	Polacek, Mark	<i>Mark Polacek</i>	COORDINATOR
15)	Radjl, George	<i>George Radjl</i>	Prod. Eng.
16)	Reyes, Manuel	<i>MANUEL REYES</i>	<i>MANUEL REYES</i>
17)	Rivera, Santos	<i>Santos Rivera</i>	<i>Santos Rivera</i>
18)	Rodriguez, Hiran	<i>Hiran Rodriguez</i>	Material handler
19)	Roman, Graciano	<i>Graciano Roman</i>	Chemical operator coordinate
20)	Sokolowski, Larry	<i>Larry Sokolowski</i>	PRODUCTION SUP
21)	Stoff, Joe	<i>Joe Stoff</i>	Chemical operator
22)	Tenegal, Dennis - Medical (one)	<i>Dennis Tenegal</i>	
23)	Young, Bennie Jr.	<i>Bennie E. Young Jr.</i>	Chemical ope.
24)	Arnes, D	<i>Danell Arnes</i>	Main
25)	Stewart, Don	<i>Don Stewart</i>	
26)	STEWART DC	<i>Don Stewart</i>	CHECKER

LARGE QUANTITY HAZARDOUS WASTE GENERATOR TRAINING



What is Hazardous Waste?

- A hazardous waste is a waste that has characteristics of ignitability, corrosivity, reactivity, or toxicity OR is listed as a hazardous waste under EPA regulations.



What is Hazardous Waste?

- Generally, hazardous waste generated by the facility is a result of production, cleanup, laboratory, disposal of obsolete chemicals etc.
- Regulatory Affairs should be notified with the characteristics of any waste that is generated at the facility. RA will make the determination if it is hazardous or not. If hazardous, RA will provide a waste stream # or profile # that should be noted on the drum.

Management of Hazardous Waste

- It is the responsibility of the department who generates a hazardous waste to properly manage the waste
 - Transfer material to a Hazardous Waste Storage Container (HWSC)
 - Notify Reg. Affairs about the generation of new waste streams
 - Keep Hazardous Waste Inspection Book

Government Regulations

- EPA Hazardous Waste may not be on the premises for more than 90 days.

- All employees involved with hazardous waste management must receive training

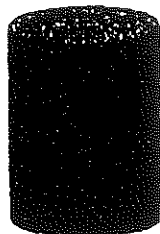


Government Regulations

- Any release of waste to the environment (via air, water, soil) greater than the RQ (Reportable Quantity) shall be reported to the proper authorities.
 - Any spill of waste should be reported to your direct supervisor immediately
 - Supervisor will confer with Regulatory Affairs about any reporting requirements

Collection & Storage Containers

- Approved containers (55 gallon drums w/ proper seal and bung if open-head)
- Drum cannot be damaged (i.e. dented, cut, missing bung)

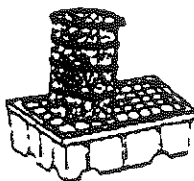


Collection & Storage Containers

- Container must have proper Hazardous Waste label and product label prior to any waste being placed inside.
- Responsible department must date the drum(s) on the day the first drop of hazardous waste is placed inside a waste container. Accumulation start date.



Secondary Containment Containers



- All Hazardous Waste must be stored in/on secondary containment devices.
- Must have the capacity to contain the full volume of the initial container in the event a leak occurs.

General Requirements for Storage of Hazardous Waste

- May not be stored on site for > 90 days.
 - The 90 day clock begins with the first drop of hazardous waste added to the container.
- In the case of satellite storage containers, it begins on the date when the material is transferred from the satellite area to the designated hazardous waste storage area.

General Requirements for Storage of Hazardous Waste

- Regulatory Affairs should be notified when the hazardous waste needs to be picked up. An inventory of the waste should be forwarded to RA, so they can track the waste.
- All hazardous waste must be stored in pre-approved areas. Where is your hazardous waste storage location?
- All containers of HLL waste must remain closed, except when adding/removing contents.

Satellite Storage Containers

- Utilized at point of waste generation and is under the control of the operator of the process generating the waste.
- Labels should use 5-gallon containers.
- Containers must be in good condition. If the container begins to leak, it must be transferred to a different container.
- The container must be compatible with the waste.

Satellite Storage Containers



- The container must always be closed during storage except when it is necessary to add or remove waste
- Must be labeled with the words "Hazardous waste" or with other words that identify the contents of the containers
- Are exempt from 90 day limit if you do not exceed 55 gallon volume limit.
- When it is should be moved within 3 days to the 55 gal drum into waste storage area.

Container Identification

- Hazardous Waste storage containers must have the proper labels.



- Supplied by Reg. Affairs or identified party.
- A Hazardous Waste label and product label.

Transferring to Storage Containers



- Prior to transferring material - Be sure to:
 - Identify the waste
 - Label the container
 - Obtain the necessary PPE
 - Have access to communication with other employees, internal alarm system

Transferring to Storage Containers



- If handling flammable/combustibles, properly ground containers (ground container and transferring device)
- Check the level of the waste in the storage container and monitor during transfer
- Notify supervisor of your actions

Hazardous Waste Inspection Log

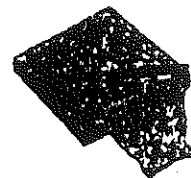
- The Hazardous Waste Storage Containers and Secondary Containers must be inspected weekly for damage and/or spills.



- Inspections shall be recorded in the Hazardous Waste Inspection Book.

Hazardous Waste Inspection Book

- A log shall be maintained by each department that generates an approved waste stream.
- Records must be kept for 3 years.



Manifests

- A manifest is the shipping document used when shipping hazardous waste.
- The original manifest should be kept onsite and a copy sent to RA.
- Manifests need to be kept for 3 years.



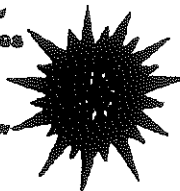
Personal Protective Equipment

- PPE must be worn by persons working with hazardous waste and hazardous waste storage containers.
- PPE includes safety glasses, face shield, protective apron, gloves, respirator (if applicable).
- What's the appropriate PPE? Consult MSDSs, supervisor, or Reg. Affairs.



Emergency Procedures

- In the event of a fire or sudden release of hazardous waste, follow the applicable procedures in the Emergency Procedures Manual.
- Communicate with fellow employees and your supervisor.



Emergency Procedures

- Emergency equipment is inspected, and reported either by maintenance or an outside firm. If any emergency equipment is damaged or missing - RA or maintenance should be notified.
- Alarm system 23336 on the phone signals people within the building. Fire alarm pull stations send messages to Security Link who contacts the fire department.



Emergency Procedures

- Small controllable fire can be attempted to be extinguished. If the fire is not immediately and completely controllable, the Emergency Coordinator should be contacted.
- Emergency Coordinators:
 - Per Mattia (P)
 - Carson Barone (S)
 - Bill Cunningham (S)
 - Bill Potoczny (R)
 - Larry Schaeffer (S)



Emergency Procedures

- ONLY employees in the immediate release area or maintenance personnel may respond to an incidental release where the spill can be absorbed, neutralized, or controlled. All other situations require notification of emergency response personnel.



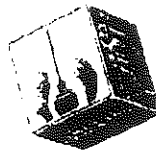
Methanol

- Flash Point - minimum temperature of the liquid at which it gives off enough vapors to form an ignitable mixture with the air. MeOH = 60°F
- Reportable Quantity - MeOH = 5,000 lbs. or 720 gallons.
- Use CO₂ or Dry Chemical for small fires.

Methanol

- Know your loading procedure!





THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

1000 WACKER DRIVE
SUITE 4100
CHICAGO, IL 60605

PHONE 1-312-554-7400
FAX 1-312-554-7499
WWW.CPHALL.COM

July 23, 2001

Mr. James Janchenko
Bedford Park Police Department
6701 S. Archer Avenue
Bedford Park, IL 60501

Dear Sir:

In January 2000 we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached is an updated version of this Manual, containing mainly phone number changes and format changes. We ask that you discard the previous Manual and replace it with this one.

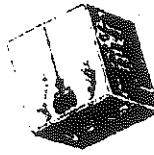
If you have any questions, please contact me at (312)554-7422.

Sincerely,

Apri A. Cesaretti
Apri A. Cesaretti
Regulatory Affairs Manager

AAC.kl

Enc



THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE 1-(312) 554-7400
FAX 1-(312) 554-7499
www.cphall.com

July 23, 2001

MacNeal Medical Center
c/o Occupational Medicine
7020 W. 79th Street
Bridgeview, IL 60455

Dear Sir/ Madam:

In January 2000 we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached is an updated version of this Manual, containing mainly phone number changes and format changes. We ask that you discard the previous Manual and replace it with this one.

If you have any questions, please contact me at (312)554-7422.

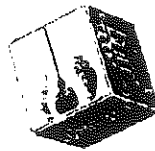
Sincerely,

April A. Cesaretti R.

April A. Cesaretti
Regulatory Affairs Manager

AAC kl

Enc



311 SOUTH WACKER DRIVE
SUITE 400
CHICAGO, IL 60606

THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE 1-(312) 554-7400
FAX 1-(312) 554-7499
www.cphall.com

July 23, 2001

Christ Hospital & Medical Center
c/o Carol Schneider/Administration
4440 W. 95th Street
Oak Lawn, IL 60453

Dear Ms. Schneider:

In January 2000 we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached is an updated version of this Manual, containing mainly phone number changes and format changes. We ask that you discard the previous Manual and replace it with this one.

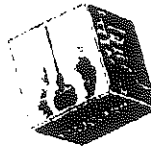
If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Cesaretti
Regulatory Affairs Manager

AAC:ki

Enc.



100 SOUTH WACKER DRIVE
SUITE 4100
CHICAGO, IL 60606

THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE 1-(312) 554-7400
FAX 1-(312) 554-7499
www.cphall.com

July 23, 2001

Local Emergency Planning Committee
c/o Kevin Phillips
1311 Maybrook Drive, Rm-108
Maywood, IL 60153

Dear Mr. Phillips:

In January 2000 we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached is an updated version of this Manual, containing mainly phone number changes and format changes. We ask that you discard the previous Manual and replace it with this one.

If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Cesaretti
Regulatory Affairs Manager

AAC:kl

Enc.



REGULATORY AFFAIRS
DEPARTMENT

The C.R. Hall Company

Chemicals for Industry Since 1919

7300 SOUTH CENTRAL AVENUE

P.O. BOX 608

BEDFORD PARK ILLINOIS 60499-0608

(708) 694-6000
FAX (708) 458-0428

July 17, 2000

Local Emergency Planning Committee
c/o Kevin Phillips
1311 Maybrook Drive, RM-108
Maywood, IL 60153

Dear Mr. Phillips:

In January we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached are some updates for the sections in this manual. Please discard the old pages and replace them with the new ones.

If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Truszkowski

April A. Truszkowski
Regulatory Affairs Manager

AAT:kl

Enc.



REGULATORY AFFAIRS
DEPARTMENT

The C.P. Hall Company

Chemicals for Industry Since 1919

1300 SOUTH CENTRAL AVENUE

P O BOX 608

BEDFORD PARK, ILLINOIS 60499-2608

(708) 594-5000
FAX (708) 596-0428

July 17, 2000

Fire Secretary Maloy
Bedford Park Fire Department
6820 S. Archer Avenue
Bedford Park, IL 60501

Dear Fire Secretary Maloy:

In January we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached are some updates for the sections in this manual. Please discard the old pages and replace them with the new ones.

If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Truszkowski *kl*

April A. Truszkowski
Regulatory Affairs Manager

AAT kl

Enc



The C.P. Hall Company

Chemicals for Industry Since 1919

7300 SOUTH CENTRAL AVENUE

P.O. BOX 608

BEDFORD PARK, ILLINOIS 60499-0608

TEL (708) 594-5900
FAX (708) 458-8486

July 17, 2000

Mr. James Janchenko
Bedford Park Police Department
6701 S. Archer Avenue
Bedford Park, IL 60501

Dear Mr. Janchenko:

In January we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached are some updates for the sections in this manual. Please discard the old pages and replace them with the new ones.

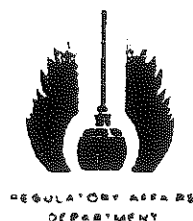
If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Truszkowski
Regulatory Affairs Manager

AAT:kl

Enc



The C.R. Hall Company

Chemicals for Industry Since 1919

7300 SOUTH CENTRAL AVENUE

P.O. BOX 608

BEDFORD PARK, ILLINOIS 60429-0608

(708) 584-6900
FAX (708) 458-0428

July 17, 2000

MacNeal Medical Center
c/o Occupational Medicine
7020 W. 79th Street
Bridgeview, IL 60455

Dear Sir/Madam:

In January we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached are some updates for the sections in this manual. Please discard the old pages and replace them with the new ones.

If you have any questions, please contact me at (312)554-7422.

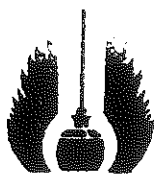
Sincerely,

A handwritten signature in cursive script that reads "April A. Truszkowski".

April A. Truszkowski
Regulatory Affairs Manager

AAT:kl

Enc.

REGULATORY AFFAIRS
DEPARTMENT**The C.P. Hall Company***Chemicals for Industry Since 1919*

7300 SOUTH CENTRAL AVENUE

P O BOX 608

BEDFORD PARK, ILLINOIS 60499-0608

(708) 554-5500
FAX (708) 458-0428

July 17, 2000

Christ Hospital & Medical Center
c/o Carol Schneider/Administration
4440 W. 95th Street
Oak Lawn, IL 60453

Dear Ms. Schneider:

In January we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached are some updates for the sections in this manual. Please discard the old pages and replace them with the new ones.

If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Truszkowski
Regulatory Affairs Manager

AAT:kl

Enc



The C.P. Hall Company

Chemicals for Industry Since 1919

311 SOUTH WACKER DRIVE

SUITE 4700

CHICAGO, ILLINOIS, U.S.A. 60606-6622

PHONE 1-(312) 554-7400
FAX 1-(312) 554-7499

February 20, 2001

Illinois EPA
Bureau of Land #24
P. O. Box 19276
Springfield, IL 62794

RE: ILT180010340

Enclosed is the 2000 Hazardous Waste Report for our facility located at 5851 W. 73rd Street in Bedford Park, Illinois.

If you have any questions, please contact me.

Sincerely,

Janelle L. Brown
Environmental & Safety Specialist

Enc.

CP HALL CO
5851 W 73RD ST
BEDFORD PARK
P

IL
60638

ILLINOIS Environmental Protection Agency
2000 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Flammable Liquid Methanol co-product
B. EPA Hazardous Waste Code: 0001 31 35 39 43 47
C. SIC code: 2869 51
D. Origin Code: 1 55 System type: M 58 if origin code = 5
E. Source Code: A49 60 A 63 A 66
F. Point of Measurement: 1 69
G. Waste form code: B203 70
H. Radioactive mixed: 2 74
I. TRI Constituent: 3 75 (if 1 or 2, go to section 2)
J. CAS numbers } 1. 67-56-1 84 2. 2 92
(From Form R) 4. 100 100 5. 108 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 118 Density: 6.6 117 lb/gal (Same unit and density must be used for all quantities on this page).
Quantity generated in: B. Previous reporting year: 161710.0 121
C. Current reporting year: 123282.0 131
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N 141 Y = Yes (continue to system 1) N = No (skip to section 3)
On-Site System 1: System Type M 142 Status 148 Quantity managed on-site this year: 147 147
On-Site System 2: System Type M 157 Status 181 Quantity managed on-site this year: 182 182

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y 172 Y = Yes (Continue to Site 1) N = No (Skip to Section 4)
SITE 1. Name and address of facility: Pollution Control Industries, 4343 Kennedy Ave., East Chicago, IN 46312
B. U.S. EPA ID No. of facility waste was shipped to: IND000646943 173
C. System type shipped to: M051 185 D. Off-site availability code: 1 189
E. Total quantity shipped in this reporting year: 123282.0 190
SITE 2. Name and address of facility:
B. U.S. EPA ID No. of facility waste was shipped to: 200 200
C. System type shipped to: M 212 D. Off-site availability code: 218 218
E. Total quantity shipped in this reporting year: 217 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? Y 227 Y = Yes (Cont to Box B) N = No (Cont to Section 5)
B. Activity: W02 228 W 231 W 234 W 237 W 240 W 243 C. Other Effects? (Y = Yes, N = No) 248 248
D. How many new waste minimization activities were implemented in this reporting year for this waste? 1 247 (Number)
E. Quantity recycled in reporting year due to new activities: 2000 248
F. Activity/Production index: 1.0 258 G. Source Reduction quantity due to new activities: 261 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N 271
B. Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) N 272
Quantity stored at year end and for 90 days or more, generated this reporting year: 0 273
Quantity stored at year end that was generated prior to this reporting year: 0 283

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 13

CP HALL CO
 5851 W 73RD ST
 BEDFORD PARK
 P

 IL
 60638

 ILLINOIS Environmental Protection Agency
 2000 Hazardous Waste Report
 Form GM - Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Waste Paint related material

B. EPA Hazardous Waste Code: D 0 0 1 F 0 0 5 31 35 39 43 47

C. SIC code: 2 8 6 9 51

D. Origin Code: 1 55 System type: M 58 E. Source Code: A 94 A 63 A 66

F. Point of Measurement: 1 69 G. Waste form code: B 203 70

H. Radioactive mixed: 2 74 I. TRI Constituent: 2 75 (if 1 or 2, go to section 2)

J. CAS numbers } 1. 76 2. 84 3. 92
 (From Form R) 4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 118 Density: 7.9 117 lb/gal (Same unit and density must be used for all quantities on this page).

Quantity generated in: B. Previous reporting year: 0 121

C. Current reporting year: 1 0 0 131

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N 141 Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type M 142 Status 146 Quantity managed on-site this year: 147

On-Site System 2: System Type M 157 Status 161 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y 172 Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Pollution Control Industries, 4343 Kennedy Ave., East Chicago, IN 46312

B. U.S. EPA ID No. of facility waste was shipped to: I N D 0 0 0 6 4 6 9 4 3 173

C. System type shipped to: M 0 4 1 185 D. Off-site availability code: 1 186

E. Total quantity shipped in this reporting year: 1 0 0 190

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: 200

C. System type shipped to: M 212 D. Off-site availability code: 216

E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N 227 Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: W 228 W 231 W 234 W 237 W 240 W 243 C. Other Effects? (Y = Yes, N = No) 248

D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)

E. Quantity recycled in reporting year due to new activities: 248

F. Activity/Production Index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N 271

B. Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) N 272

Quantity stored at year end and for 90 days or more, generated this reporting year: 0 273

Quantity stored at year end that was generated prior to this reporting year: 0 283

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 13

CP HALL CO
5851 W 73RD ST
BEDFORD PARK
PIL
60638ILLINOIS Environmental Protection Agency
2000 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32. Also SEE Common Errors on page 7 of the instructions.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: Liquid, Toxic waste from laboratory operations

B. EPA Hazardous Waste Code: D 0 0 8 D 0 2 2 D 0 2 8 D 0 3 8 F 0 0 2 F 0 0 3
31 35 39 43 47 F 0 0 5

C. SIC code: 2 8 6 9
51

D. Origin Code: 1 System type: M
55 if origin code = 5 56

E. Source Code: A 94 A A
60 63 68

F. Point of Measurement: 1
69

G. Waste form code: B 2 0 3
70

H. Radioactive mixed: 2
74

I. TRI Constituent: 3 (if 1 or 2, go to section 2)
75 92

J. CAS numbers) 1. 7 1 - 3 6 - 3 2. 84
78 84
(From Form R)) 4. 100 5. 108
100 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 7.9 lb/gal (Same unit and density must be used for all quantities on this page).
118 117Quantity generated in: B. Previous reporting year: 9 3 5 . 0
121C. Current reporting year: 9 4 5 . 0
131D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)
141On-Site System 1: System Type M Status 148 Quantity managed on-site this year: 147
142On-Site System 2: System Type M Status 181 Quantity managed on-site this year: 182
157

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)
172SITE 1. Name and address of facility: Safety Kleen, 6125 N. Pecatonica Rd.,
Pecatonica, IL 61063B. U.S. EPA ID No. of facility waste was shipped to: I L D 9 8 0 5 0 2 7 4 4
173C. System type shipped to: M 141 D. Off-site availability code: 1
185 188E. Total quantity shipped in this reporting year: 4 4 0 . 0
190SITE 2. Name and address of facility: Pollution Control Industries, 4343 Kennedy Ave.,
East Chicago, IN 45312B. U.S. EPA ID No. of facility waste was shipped to: I N D 0 0 0 6 4 6 9 4 3
200C. System type shipped to: M 041 D. Off-site availability code: 1
212 218E. Total quantity shipped in this reporting year: 5 0 5 . 0
217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5)
227B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 246
228 231 234 237 240 243D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)E. Quantity recycled in reporting year due to new activities: 248F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N
271B. Did this site store RCRA wastes on-site for more than 90 days and waste is still in storage at year end: (Y=Yes, N=No) N
272Quantity stored at year end and for 90 days or more, generated this reporting year: 0
273Quantity stored at year end that was generated prior to this reporting year: 0
283COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page
293 13

CP HALL CO
5851 W 73RD ST
BEDFORD PARK
P

IL
60639

ILLINOIS Environmental Protection Agency
2000 Hazardous Waste Report
Form TI - Transporter Identification

Instructions for this form found on page 33.

1. U.S. EPA ID No. I L D 9 8 4 7 7 5 0 4 9 Hauling Permit No. U P W 3 2 8 1 0 3 I L
31 127

Transporter Name and Address: Ozinga Transportation, 21900 S. Central Ave.,
Matteson, IL 60443

2. U.S. EPA ID No. S C R 0 0 0 0 7 4 5 9 1 Hauling Permit No. U P W 2 0 3 9 5 4 O H
43 139

Transporter Name and Address: Safety Kleen Pecatonica (TG) Inc.
6125 N. Pecatonica Rd., Pecatonica, IL 61063

3. U.S. EPA ID No. I L R 0 0 0 0 3 4 3 8 9 Hauling Permit No. U P W 0 0 2 8 6 3 3 O H
55 151

Transporter Name and Address: Van Waters and Rogers, Inc.
8500 W. 68th St., Bedford Park, IL 60501

4. U.S. EPA ID No. _____ Hauling Permit No. _____
67 163

Transporter Name and Address:

5. U.S. EPA ID No. _____ Hauling Permit No. _____
79 175

Transporter Name and Address:

6. U.S. EPA ID No. _____ Hauling Permit No. _____
91 187

Transporter Name and Address:

7. U.S. EPA ID No. _____ Hauling Permit No. _____
103 199

Transporter Name and Address:

8. U.S. EPA ID No. _____ Hauling Permit No. _____
115 211

Transporter Name and Address:

COMMENTS: _____ Enter Y(Yes) if you have comments regarding this page; attach extra sheet. Page _____
223 13

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
DIVISION OF LAND POLLUTION CONTROL
INVENTORY DATA INPUT FORM

To be submitted only to change annual report contact information or information on the mailing label on your instruction package.

Inventory I.D. Number	Card Type	Trans Code	Transaction Date (month,day,year)	Initials
-----10	060	C	03/01/01	H A W
	11 13 14		15 20	21 23

-----ANNUAL REPORT ADDRESS-----

1. Company Name

The C. P. Hall Company-----53

2. Street 311 S. Wacker Drive, Suite 4700-----78

3. P.O. Box -----84

4. City Chicago-----104

State IL Zip 60606 - 6604

5. Telephone Number: 312 / 554 - 7400

6. Contact Person

(First Name) APRIL (Last Name) TRUSZKOWSKI

7. Contact Person Title D (enter code from list that best describes the contact person's title)

A = President	H = Environmental Specialist/Analyst/Technician
B = Vice President	I = Safety Coordinator/Director/Administrator/Officer
C = Manager, Operations	J = Environmental Engineer
D = Environmental Coordinator/Manager	K = Engineer, Plant/Process/Production/Project
E = Plant Manger	M = District/Regional Manager
F = Agent for Company	N = Consultant
G = Technical Manager	Z = Other: Specify _____

8. New Notifier Code _____ (G = Generator)

CP HALL CO
5351 W 73RD ST
BEDFORD PARK
IL
60639

ILLINOIS Environmental Protection Agency
2000 Hazardous Waste Report
Form IC - Identification and Certification

Instructions for this form found on pages 11-16

This form must be completed for the location shown on the above label. If you need additional forms for other locations, call IEPA.

SECTION 1. GENERATOR STATUS

A. 1 RCRA Generator Status (enter one code)

- 1 = LQG
2 = SQG } Skip to Box C
3 = CESQG }
4 = Nongenerator (continue to Box B)

B. Reason for not generating (Check all that apply)

- 32 ☐ Never generated
33 ☐ Out of business
34 ☐ Only excluded or delisted waste generated
35 ☐ Only non-hazardous waste generated

- 36 ☐ Periodic generator, none in reporting year
37 ☐ Waste minimization activity
38 ☐ Other (specify in comments box)

C. 1 Status Time Period: 1 = Expected to be the same next year and following years

2 = Expected to change next year

3 = Although a LQG during this reporting year, this was a one-time event or the company is out of business; the company at this location will NOT be a LQG next year.

SECTION 2. ENTER THE SIC CODE(S) FOR THIS LOCATION

40 2869 44 48 52

SECTION 3. ON-SITE WASTE MANAGEMENT STATUS (enter one code for each question)

- A. 1 RCRA regulated (permitted or interim status) storage
B. 1 RCRA permitted or interim status treatment, disposal, or recycling
C. 1 Treatment, disposal, or recycling exempt from RCRA permit requirements

SECTION 4. WASTE MINIMIZATION ACTIVITY DURING THE REPORTING YEAR. (Only LQGs are required to complete Section 4.)

59 Y Does your facility have a waste minimization plan or organized approach to investigate source reduction and recycling opportunities? Enter Y for Yes or N for No

COST ESTIMATES FOR FACILITIES, Interim status and permitted

A. Closure cost estimate: \$, , .

B. Estimate for post closure monitoring and maintenance costs (disposal facilities only):

\$, , .

Comments: 83 Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

Section 5. The Environmental Protection Agency is authorized to require this information under the Illinois Compiled Statutes ("ILCS"), 1994 as amended, Chapter 415 ILCS 5/4 and 21. Disclosure of this information is required. Failure to disclose this information may result in civil and criminal penalties pursuant to 415 ILCS 5/42 and 44. This form has been approved by the Forms Management Center.

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last Name Brown First Name Janelle B. Title Environmental & Safety Specialist

C. Signature Janelle Brown D. Date of Signature 2/20/01

Name and Telephone number of person to contact if there are questions about this report.

Janelle Brown (312) 554-7635



3100 SOUTH WACKER DRIVE
SUITE 400
CHICAGO, ILLINOIS 60606

THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE (312) 554-7400
FAX (312) 554-7499
www.cphall.com

July 23, 2001

Fire Secretary Maloy
Bedford Park Fire Department
6820 S. Archer Avenue
Bedford Park, IL 60501

Dear Sir:

In January 2000 we sent you a copy of our Emergency Procedures Manual for our manufacturing facility located at 5851 W. 73rd Street in Bedford Park. Attached is an updated version of this Manual, containing mainly phone number changes and format changes. We ask that you discard the previous Manual and replace it with this one.

If you have any questions, please contact me at (312)554-7422.

Sincerely,

April A. Cesaretti

April A. Cesaretti
Regulatory Affairs Manager

AAC kl

Enc.

IEPA

12/20/99

CP Hall

Last inspection 1983

Tanks in question installed in 1991 (North)
and 1995 (South)

Maywood Region Supervisor: Cliff Gould

708-338-7900

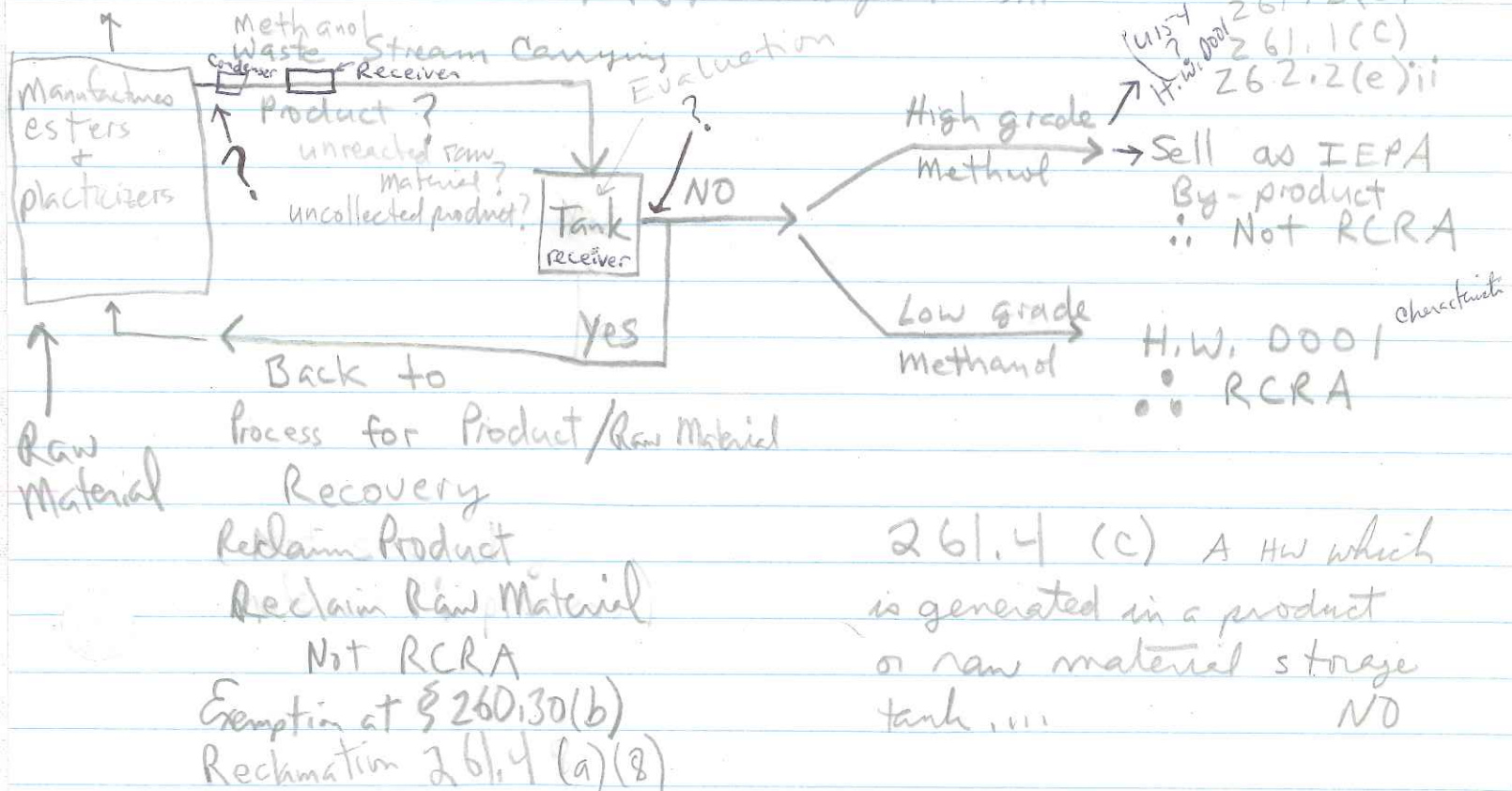
Inspector: Anna Van Orden

POC: Richard Friel, IEPA

Exclusion to the solid waste definition

Product

261.4(a)(8) Secondary materials



12/17/99

p. 4, 1st Paragraph

"two different grades of methanol streams,
high-purity grade and a low purity grade.

high purity grade → Illinois exception from
the definition of "solid waste" (pg. 2)

April T. :

Low grade methanol
Disposed of offsite

DOO 1

↓
 V2 → Reactn Receiver → Reclm Receiver → North Receiver → High grade
 ① Process is complete at T9 process → D001

- ② From T9 enters North receiver Tank
- Reclamation not regulated
 - or
 - By product not regulated
 - or
 - D001 regulated

The North receiver is not (261.4(c))
 a manufacturing process unit

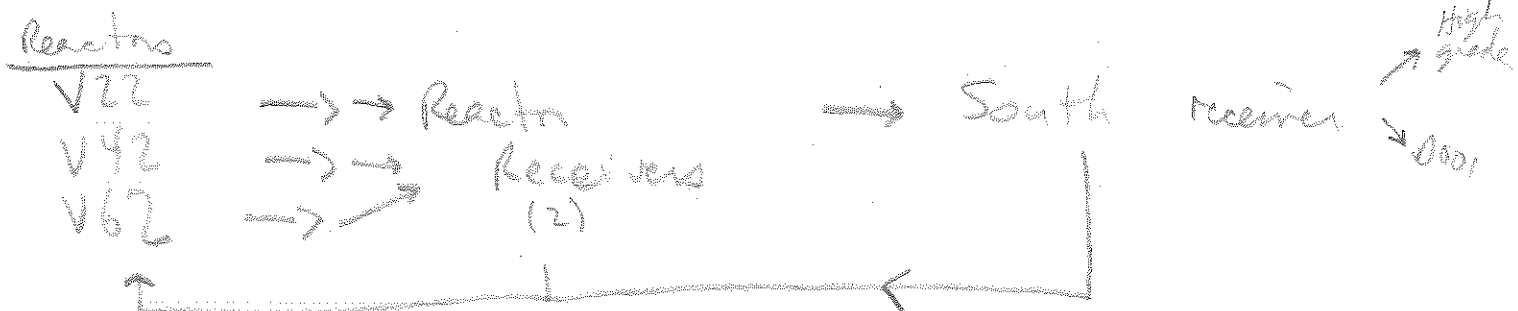
- the process is complete prior to storage of D001 in the tank

an associated non-waste treatment
 manufacturing unit

- D001 is a waste
- there is no "manufacturing" occurring in the tank

V.60

Receiver may also HW storage tank



DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Pat Mullin, Plant Manager
C.P. Hall Company
P.O. Box 910
Bedford Park, Il 60499-0910

Re: Notice of Violation and
Request for Information
U.S. EPA ID: ILT 180 010 340

Dear Mr. Mullin:

This letter is in response to your letter and response dated December 9th, 1999, to the U.S. EPA Region 5 Resource and Conservation Recovery Act (RCRA) § 3007 Information Request that was dated October 22, 1999.

Your response was adequate to show compliance with personnel training required by 40 CFR §265.16 (see also 40 CFR 262.34(a)(4)). U.S. EPA requires no further action from C.P. Hall Company based on the information provided.

In your response you asked U.S. EPA if it would reconsider the Illinois Environmental Protection Agency (IEPA) decision that the methanol stream is a by-product, and not a co-product. U. S. EPA respectfully declines to do so.

Your response was not adequate to show compliance to the issue of the lack of labels required by 40 CFR §262.34(a)(3) on tanks (the North and South Receivers) storing hazardous waste. The C.P. Hall Company's position appears to be that because material other than hazardous waste is occasionally stored in the receiver tanks, the receiver tanks cannot be hazardous waste storage tanks. The U.S. EPA's position is that if the C.P. Hall Company uses the receiver tanks to store hazardous waste prior to the waste's transportation to a Treatment, Storage or Disposal (TSD) facility, then the tanks are hazardous waste storage tanks subject to Minnesota and Federal hazardous waste storage rules. U.S. EPA basis it's decision that the receiver tanks are hazardous waste storage tanks on the following reasoning:

- The C.P. Hall company claims the hazardous waste is generated in the receiver tanks. U.S. EPA disagrees with this conclusion. The hazardous waste is generated in the condensers and sent to the receiver tanks for evaluation and storage. Therefore, the exclusion at 40 CFR §261.4 claimed by the C.P. Hall Company actually applies to the condensers and not the receiver tanks. This supports the conclusion that the receiver tanks are hazardous waste storage tanks.

- C.P. Hall company did not provide documentation to support a by-product exemption from July, 1991 until February, 1998 for the north receiver tank and from April, 1995 until February, 1998 for the south receiver tank. The by-product determination by the Illinois Environmental Protection Agency (IEPA) did not occur until May, 1999. This supports the conclusion that the receiver tanks are hazardous waste storage tanks subject to closure before the receiver tanks can lose their hazardous waste storage designation.

- From the C.P. Hall documentation provided, it appears that the C.P. Hall company shipped all hazardous waste, whether high or low grade methanol, to TSD facilities prior to the T & T Industries contract dated February 4, 1998. This supports the conclusion that the receiver tanks are hazardous waste storage tanks and were such from their dates of installation.

- Finally, low grade methanol is not, according to C.P. Hall, a by-product and is at this point in time always a hazardous waste. The very first time this waste was stored in the receiver tanks should have caused C.P. Hall company to designate those tanks hazardous waste storage tanks, a designation that remains until the tanks undergo closure.

The receiver tanks are hazardous waste storage tanks and will remain so until such time as the C.P. Hall Company:

- Ceases to store low grade methanol in the receiver tanks prior to shipment to a TSD;

- Ceases to store a majority of high grade methanol in the receiver tanks prior to shipment to a TSD facility;

- Conducts RCRA closure on the receiver tanks.

Therefore, the U.S. EPA believes the C.P. Hall Company must comply with 40 CFR 262.34(a) and all requirements thereof, including but not limited to subpart J of 40 CFR part 265, and evaluation for and compliance with subparts AA, BB, and CC of 40 CFR part 265.

This determination does not limit the applicability of either the requirements examined or other RCRA regulations. Your installation will continue to be evaluated by U.S. EPA and the Illinois Environmental Protection Agency in the future.

U.S. EPA requests a meeting with C.P. Hall company at our Regional Headquarters at 77 West Jackson Street, Chicago, IL. At this meeting U.S. EPA will give C.P. Hall Company an opportunity to show cause why U.S. EPA should not take formal action against C.P. Hall in connection with the violations listed above, including the assessment of appropriate civil penalties. At this meeting, the U.S. EPA will allow C.P. Hall to present information relevant to 1) the factual bases for U.S. EPA's allegations, and 2) factors that might mitigate penalties assessed for the violation. C.P. Hall should be prepared to provide relevant documentation of matters it presents at the meeting, U.S. EPA may consider information provided in the meeting in civil or criminal proceedings related to this matter.

C.P. Hall may be represented by legal counsel. Due to the informal nature of the meeting, neither C.P. Hall nor U.S. EPA will be allowed to have the proceedings transcribed by a court reporter.

If you have any questions regarding this matter, please contact Daniel F. Chachakis, of my staff at (312) 886-2022, or have your attorney contact Mr. Michael Berman, Office of the Regional Council, at 312-886-6837.

Sincerely yours,

Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste Pesticides and Toxics Division

Enclosures

cc: Tod Marvel, IEPA

bcc: Leverett Nelson, C-14J
Section file
Branch file

ENFORCEMENT & COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	OFFICE OF REGIONAL COUNSEL	COMPLIANCE SECTION 1 SECTION CHIEF



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

NOV 15 1999

REPLY TO THE ATTENTION OF

DE-9J

Ms. April Truszkowski
Regulatory Affairs Specialist
The C.P. Hall Company
7300 South Central Avenue
P.O. Box 608
Bedford Park, IL 60498-0808

Re: Approval of Extension
U.S. EPA ID: ILT 180 010 340

Dear Ms. Truszkowski:

I am pleased to inform you that the Enforcement and Compliance Assurance Branch (ECAB), U.S. Environmental Protection Agency (U.S. EPA) Region 5, has approved your extension to reply to our Notice of Violation (NOV). The new suspense date is now December 10, 1999. If you need any further assistance, you can contact me at 312-886-2022, or e-mail me at chachakis.daniel@epa.gov.

Thank you for your efforts to resolve all the issues presented in the NOV.

Sincerely,

A handwritten signature in dark ink, appearing to read "D. F. Chachakis".

Daniel F. Chachakis, EPS
Compliance Section 1
Enforcement and Compliance Assurance Branch
Waste, Pesticides and Toxics Division

81
1000
1000

NOV 11 1960

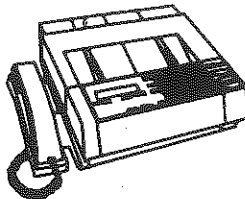
NOV 11 1960



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



FACSIMILE REQUEST AND COVER SHEET

FTS: 353-4342

COMM: 312/353-4342

METCALFE FEDERAL BUILDING

VERIFICATION NO. 353-3808

OFFICE/TELEPHONE
OF RECIPIENT:

MACHINE NO. 1-708-594-5904

708-594-5077

TO:

Ms. April Truszkowski

FROM:

Mr Dan Chachakis

TELEPHONE NUMBER (FTS or commercial):

312-886-2022

COMMENTS:

Approval of Extension

DATE: 11/15/99

PLEASE NUMBER ALL PAGES

NUMBER OF PAGES, INCLUDING COVER SHEET:

PAGE 1 OF 2

*** TRANSMISSION REPORT ***

NOV-15-99 10:41

ID:312 353 4342

USEPA REGION 5

JOB NUMBER

922

INFORMATION CODE

OK

TELEPHONE NUMBER

917085945904

NAME (ID NUMBER)

START TIME

NOV-15-99 10:39

PAGES TRANSMITTED

002

TRANSMISSION MODE

EMMR

RESOLUTION

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SECURITY

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MACHINE ENGAGED

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THIS TRANSMISSION IS COMPLETED.

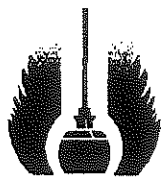
LAST SUCCESSFUL PAGE 002



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590



FACSIMILE REQUEST AND COVER SHEET	
FTS 312-412 COMM 312-353-4342	METCALLE FEDERAL BUILDING VERIFICATION NO. 353-4342
OFFICE/TELEPHONE OF RECIPIENT:	MACHINE NO. 1-708-594-5904 708-594-5077
TO: Ms. April Tryszowski	
FROM: Mr. Dan Chachakis	
TELEPHONE NUMBER (FTS or commercial): 312-886-2022	
COMMENTS: Approval of Extension	
DATE: 11/15/99	
PLEASE NUMBER ALL PAGES	
NUMBER OF PAGES, INCLUDING COVER SHEET: PAGE 1 OF 2	

REGULATORY AFFAIRS
DEPARTMENT**The C. P. Hall Company***Chemicals for Industry Since 1919*

7300 SOUTH CENTRAL AVENUE

P.O. BOX 608

BEDFORD PARK, ILLINOIS 60499-0808

(708) 594-5900
FAX (708) 456-0420

November 12, 1999

Mr. Daniel F. Chachakis
USEPA
Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

FAX: 312-353-4342

RE: Request for Extension on Notice of Violation
and Request for Information
U.S. EPA ID: ILT 180 010 340

Dear Mr. Chachakis:

Per our phone conversation, I would like to request an extension until December 10, 1999, to reply to your referenced letter above.

Please reply as soon as possible with your determination. My fax number is 708-594-5904, and my phone number is 708-594-5077. Thank you in advance.

Sincerely,
THE C. P. HALL COMPANY

April Truszkowski
Regulatory Affairs Manager

OCT 22 1999

DE-9J

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Pat Mullin, Plant Manager
C.P. Hall Company
P.O. Box 910
Bedford Park, Il 60499-0910

Re: Notice of Violation and
Request for Information
U.S. EPA ID: ILT 180 010 340

Dear Mr. Mullin:

On August 16, 1999, United States Environmental Protection Agency (U.S. EPA) representative, John Gaitskill, inspected the C. P. Hall facility at 5981 West 73rd Street in Bedford Park, Illinois to determine the compliance status with regard to the Resource Conservation and Recovery Act as amended (RCRA).

The inspection included a review of records relating to hazardous waste management and a tour of the areas where hazardous waste was handled. Ms. April Truszkowski of C.P. Hall Company was the host for the inspection. The inspection noted some issues that may constitute violations of RCRA. These issues included the lack of labels required by 40 CFR §262.34(a)(3) on tanks storing hazardous waste and records of personnel training required by 40 CFR §265.16 through 40 CFR 262.34(a)(4). Mr. Gaitskill's inspection report is attached.

Enclosed with this notice is a request for information by the U.S. EPA in accordance with its authority under Section 3007 of RCRA, as amended, 42 U.S.C. §6927. You are requested to provide information concerning the items shown in Part III of the Information Request.

The information requested in Part III of this letter must be provided to this office within thirty (30) days of receipt of this letter notwithstanding its possible characterization as confidential information. You may, in accordance with 40 CFR 2.203(a), assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR Part 2.203(b). Information covered by such a claim will be disclosed by U.S. EPA

P 140 893 173

US Postal Service

Receipt for Certified Mail

No Insurance Coverage Provided.

Do not use for International Mail (See reverse)

Sent to	
MR. Pat Mullin, Plant Manager	
Street & Number	
P.O. Box 910	
Post Office, State, & ZIP Code	
Bedford Park, IL 60499-0910	
Postage	\$ 1.87
Certified Fee	1.40
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt Showing to Whom & Date Delivered	125
Return Receipt Showing to Whom, Date, & Addressee's Address	
TOTAL Postage & Fees	\$ 4.50
Postmark or Date	

PS Form 3800, April 1995

D. Chachakis

SENDER:

- Complete items 1 and/or 2 for additional services.
- Complete items 3, 4a, and 4b.
- Print your name and address on the reverse of this form so that we can return this card to you.
- Attach this form to the front of the mailpiece, or on the back if space does not permit.
- Write "Return Receipt Requested" on the mailpiece below the article number.
- The Return Receipt will show to whom the article was delivered and the date delivered.

I also wish to receive the following services (for an extra fee):

- ☐ Addressee's Address
- ☐ Restricted Delivery

Consult postmaster for fee.

3. Article Addressed to:

MR. Pat Mullin, Plant Manager
C.P. HALL Company
P.O. Box 910
Bedford Park, IL 60499-0910

4a. Article Number

P-140-893-173

4b. Service Type

- ☐ Registered
- ☐ Express Mail
- ☐ Return Receipt for Merchandise
- ☒ Certified
- ☐ Insured
- ☐ COD

7. Date of Delivery

10-26-99

5. Received By: (Print Name)

6. Signature: (Addressee or Agent)

X

[Signature]

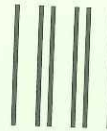
8. Addressee's Address (Only if requested and fee is paid)

PS Form 3811, December 1994

Domestic Return Receipt

Thank you for using Return Receipt Service.

UNITED STATES POSTAL SERVICE



First-Class Mail
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Permit No. G-10

• Print your name, address, and ZIP Code in this box •

U.S. EPA
77 W. JACKSON BLVD.
DE-9J
CHICAGO, IL 60604
D. Chachakis

only to the extent and by means of the procedures set forth in 40 CFR Part 2, Subpart B. Any request for confidentiality must be made when the information is submitted, since any information not so identified may be made available to the public without further notice.

The written statements submitted pursuant to this request must be notarized and submitted under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. In addition, any documents submitted to U.S. EPA Region 5 in response to this information request should be certified as true and authentic to the best of the signatory's knowledge and belief.

Should the signatory find, at any time after the submittal of the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should so notify Region 5. If any answer certified as true should be found to be untrue or misleading, the signatory can and may be prosecuted in accordance with 18 U.S.C. §1001. U.S. EPA has the authority to use the information requested herein in an administrative, civil, or criminal action. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. §3501 et seq.

If you have any questions regarding this matter, please contact Daniel Chachakis, of my staff, at (312) 886-2022. Your response should be sent to the U.S. Environmental Protection Agency, Region 5, Enforcement and Compliance Assurance Branch (DE-9J), 77 West Jackson Boulevard, Chicago, Illinois 60604, Attention: Daniel F. Chachakis.

Sincerely,



Lorna M. Jereza, P.E., Chief
Compliance Section 1
Enforcement and Compliance Assurance Branch

Enclosures

cc: Gino Bruni, IEPA
Tod Marvel, IEPA

bcc: Leverett Nelson, C-14J
Section file
Branch file

ENFORCEMENT & COMPLIANCE ASSURANCE BRANCH

SECRETARY	SECRETARY	SECRETARY
AUTHOR/ TYPIST	OFFICE OF REGIONAL COUNSEL	Compliance Section I SECTION CHIEF
DFC 10/21/99		MJ 10/21/99

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: 30 August 1999

SUBJECT: RCRA Records Confusion, C.P. Hall Inc, Bedford Park, IL
ILT 180 010 340
ILD 004 163 283

FROM: John Gaitskill, Environmental Engineer *JTG*
Illinois/Indiana Section
Enforcement and Compliance Assurance Branch

TO: Lorna Jereza, Chief, IL/IN Section, ECAB

While researching in preparation for the RCRA inspection of C.P. Hall, I discovered some conflicting information. In the WPTD records center, the documents for the above ID numbers were filed as non-regulated, using an ID number indicating it is temporary. A check of October 1998 RCRIS records indicated the facilities to be shutdown, however, in July 1999, RCRIS was changed to indicate the facilities to be very small quantity generators. There is no correspondence in the file since 1995. A letter of September 1995 from C.P. Hall to Sharon Kiddon, USEPA, says the company was notified it had been deactivated, but informing USEPA it is an active generator.

The inspection indicated the C.P. Hall's plant at 5851 West 73rd Street, Bedford Park, IL to have 2 tanks that store material generated by the manufacturing process. The company claims it is a by product, but it has been routinely shipped offsite at approximately 2 week intervals using hazardous waste manifests. None has been sold as by product during 1999. C.P. Hall said it sold some in 1998, but could not provide documentation during the inspection. A \$3007 information request is being prepared to have C.P. Hall verify its RCRA status.

The inspection acknowledgment letter to the company will include a RCRA \$3007 request for additional information not available during the inspection. Also the ID numbers for C.P. Hall need to be verified as correct. I understand an "ILT" ID number should not be permanently assigned as a RCRA ID number. RCRIS should indicate the facility at 5851 West 73rd Street, Bedford Park, IL to be a large quantity generator. It presently has the ID ILT 180 010 340. The building at 7300 South Central Avenue, Bedford, IL appears to be a very small quantity generator. The response to the 3007 request should verify the generator status of C.P. Hall facilities. *ILD 004 163 283*

I had a conversation with Gino Bruni of IEPA prior to my inspection, who indicated there had been an inspection by IEPA in 1983. The inspector apparently told C.P. Hall it was not regulated under Illinois RCRA regs. I described the activities I observed during my inspection of 16 August 1999 and

Gino agreed that C.P. Hall is probably a large quantity generator, in light of the quantity of material manifested off site as hazardous waste.


Upon receipt of the response from C.P. Hall to the \$3007 request, RCRIS should be corrected, and the ILT ID number verified as correct. —

cc: Jane Ratcliffe, PMB, IMS, DR-7J

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: 30 August 1999

SUBJECT: RCRA Records Confusion, C.P. Hall Inc, Bedford Park, IL
ILT 180 010 340
ILD 004 163 283

FROM: John Gaitskill, Environmental Engineer 
Illinois/Indiana Section
Enforcement and Compliance Assurance Branch

TO: Lorna Jereza, Chief, IL/IN Section, ECAB

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cc: Jane Ratcliffe, PMB, IMS, DR-7J

8/30/99

**U.S. EPA
INSPECTION REPORT**

**Facility:
C.P. Hall Company
ILT 180 010 340
ILD 004 163 283**

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: 30 August 1999

SUBJECT: RCRA Inspection, C.P. Hall, Bedford Park, IL
ILT 180 010 340
ILD 004 163 283

FROM: John Gaitskill, Environmental Engineer *JG*
Illinois/Indiana Section
Enforcement and Compliance Assurance Branch

TO: file

On 16 August 1999, I inspected the C.P. Hall Co. to determine its compliance status with RCRA regulations. The RCRA document file was reviewed prior to the inspection. It contains a notification of hazardous waste activity and permit application sent to U.S. EPA in 1980. Subsequent correspondence indicates confusion about the status of the company. U.S. EPA notified C. P. Hall that it was not subject to permitting requirements since it was a generator, not a TSD, and its permit application should be withdrawn. A 1983 letter to IEPA from C.P. Hall says an IEPA inspector advised the company it was not subject to the state waste disposal regulations at 35 Ill. Adm. 720 through 725. Other correspondence from U.S. EPA indicates the ID number ILT 180 010 340 to have been mistakenly deactivated. These letters are attachment 1.

Prior to the inspection I contacted April Truszkowski, Regulatory Affairs Manager, to determine the location to arrive for the inspection. She said I should come to 7300 South Central Avenue, Bedford Park, IL.

The C.P. Hall Co. manufactures plasticizers and performance additives for the polymer industries. The company is a major producer of polyester polymeric plasticizers and specialty ester plasticizers. The company's corporate headquarters are located in Chicago. Pages from the company's website are attachment 2.

Ms. Truszkowski met me as scheduled and we began with a tour of the plants. The facility at 7300 South Central Avenue, Bedford Park, IL is known as an order fulfillment center, where the products are repackaged and shipped. It is a warehouse and truck loading dock with some outside storage. Ms. Truszkowski said the only hazardous waste activity at this site is the rare storage and shipping of lab packs. She showed me the drum storage area. No waste was present during the inspection. The ID for this site is ILT 004 163 283.

The inspection moved to C.P. Hall's manufacturing and technical center at 5852 West 73rd Street, Bedford Park, IL, about 500 meters west of the order fulfillment center. The building contains the manufacturing equipment. Hazardous waste activities include a drum storage area in the building. Two containers were present at this area. These containers were DOT 55 gallon drums each of which had been placed in a plastic container with a threaded lid. The plastic containers were not labeled, but each drum did have a label indicating the contents to be hazardous waste. Because of the small space between the drum and the wall of the plastic container the accumulation start date could not be read. Ms. Truszkowski said the previous hazardous waste drums were shipped the end of July 1999, so the hazardous waste drums on site should have been in place less than a month. The drums contained lab waste.

There are 2 tanks in the manufacturing plant containing material that is transported offsite as hazardous waste. They are identified as the North Train and South Train MECH Receiver tanks. Each has a fixed roof and has a capacity of 4000 gallons, but no records were available for verification of the capacity or the installation date. The tanks did not have labels identifying the contents as hazardous waste. They are filled through piping from the manufacturing process. Each tank has a pipe attached to the top which Ms. Truszkowski said was to vent the vapors to a condenser. She did not know the location of the condenser. The contents of the tanks are sent through a bulk loading rack in pipes directly from the tanks.

We discussed the records required by RCRA. She provided manifests for offsite shipments of hazardous waste. They indicated that during 1999, there were 4 shipments of 2-3 drums each of lab waste, occurring in January, March, June, and July. The waste codes for each shipment were D004, D008, D022, D028, F002, F003, and F005.

Manifests were produced for the contents of receiver tanks. Ms. Truszkowski described these tanks as "end process vessels", which receive methanol, a by-product from the manufacturing process. C. P. Hall attempts to sell the methanol, but if no buyer can be found, sends it offsite as D001 hazardous waste. The manifests indicate shipments of 2000-3000 gallons in bulk tanker trucks, occurring at 2-3 week intervals during 1999. Ms. Truszkowski indicated all the methanol generated at this site during 1999 was shipped offsite as hazardous waste. The last sale of methanol occurred in 1998, but the records of individual sales were not reviewed.

Other documents requested for review were training records, the contingency plan, and inspection records. The records for the training program required by 40 CFR §265.16 through 40 CFR §262.34(a)(4) were not available. The contingency plan was reviewed for compliance with 40 CFR Part 265, Subpart D. It contained some outdated information, including the address for U.S. EPA at 230 South Dearborn, Chicago. The inspection records for the drum storage area indicated a weekly observation for spills. No records for inspections of the North and South train MECH Receiver tanks were produced. 40 CFR §265.195 through 40 CFR §252.34(a)(1)(ii) requires daily inspections of hazardous waste storage tanks.

After the inspection we were joined by the plant manager, Pat Mullin. I explained my concern about whether or not the receiver tanks are hazardous waste tanks and therefore subject to the requirements for a large quantity generator in 40 CFR Part 265, subpart J, through 40 CFR §262.34(a)(1)(ii). I told them that I would try to finish the inspection report in a couple of weeks, and would be sending a letter describing my concerns. I gave Ms. Truszkowski a copy of the IEPA RCRA Generator Inspection Checklist.

Attachments

1. Correspondance
2. Webpages for C.P. Hall
3. Excerpts from drum storage inspection record book
4. Completed inspection checklist
5. IEPA 1998 hazardous waste report





REGULATORY AFFAIRS
DEPARTMENT

The C.P. Hall Company

Chemicals for Industry Since 1919

7300 SOUTH CENTRAL AVENUE

P.O. BOX 608

BEDFORD PARK, ILLINOIS 60499-0608

RECEIVED
MAIL ROOM OCT 13 1995

OCT 13 1995

(708) 594-5900
FAX (708) 458-0428

September 29, 1995

Sharon Kiddon
Waste Management Division
U.S. EPA
Region V
77 West Jackson Blvd.
Chicago, IL 60604-3590

RECEIVED
OCT 3 1995

SUPERFUND PROGRAM
MANAGEMENT BRANCH

Dear Ms. Kiddon:

This is a response to your letter notifying me that you have inadvertently deactivated the USEPA ID Number for the following facility:

The C. P. Hall Company
5851 W. 73rd St.
Bedford Park, IL 60499
ID No. ILT 180010340

I have been notified of the deactivation due to a letter I sent to USEPA on 8/9/95 informing your office of this issue. I do not have any record or recollection of sending such a letter to your office.

I am informing the USEPA that this facility is still currently a waste generator and this ID Number should continue to be active.

Please contact me at (708) 594-5978 regarding this issue as soon as possible.

Sincerely,

Christopher G. Meringer
Regulatory Affairs Supervisor

CGM:kl



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY **RECEIVED**
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590
WMD RECORD CENTER
SEP 29 1995

*The C.P. Hall Co
Christopher G. Muringer
P.O. Box 608
Bedford Park, Ill 60499*

REPLY TO THE ATTENTION OF:

This is in response to your letter of 8/9/95 regarding
the following installation:

U.S. EPA ID NUMBER:

LOCATION OF INSTALLATION:

*Alt 180 010340
5851 W 73rd St
Bedford Park, Ill 60499*

According to the information submitted, you have indicated that this facility
is no longer in need of the U.S. EPA ID number. Your ID number has been
coded as an inactive number. DO NOT USE this number without re-notifying the
U.S. EPA of your activity.

If you have any questions or need further assistance, please contact me at
(312) 886-6173.

Sincerely,

Sharon Kiddon

Sharon Kiddon
RCRA Notifications Coordinator
Waste Management Division

Enclosure

cc: State Agency
File



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION
345 COURTLAND
ATLANTA, GEORGIA

To: <i>Duncan Campbell</i>		From: <i>JMG</i>
Dept/Agency: <i>Region 5 @</i>		Phone #: <i>404-347-7603</i>
Fax #: <i>312-353-4788</i>		Fax #: <i>404-347-5205</i>
NSN 7540-01-317-7368		5099-101
GENERAL SERVICES ADMINISTRATION		

MEMORANDUM

DATE: AUG 03 1993

SUBJECT: Show-Cause Meetings

FROM: James S. Kutzman, P.E.
Associate Division Director
Office of RCRA and Federal Facilities

TO: Joseph R. Franzmathes, Director
Waste Management Division

The purpose of this memorandum is to obtain your approval of the use of Show-Cause Meetings in our RCRA Enforcement proceedings. The Show-Cause Meetings are informal in nature and are designed to improve the factual basis of our Complaints before we issue them. The RCRA regulations are silent on the use of such informal pre-order meetings.

Based on my experience with other enforcement programs in EPA, I think that it would be helpful for RCRA to have the flexibility to conduct Show-Cause Meetings prior to issuing a formal enforcement action. These Meetings in other programs often led to a clearer understanding by EPA of the facts in a particular case, prior to issuing the formal enforcement action. The improved clarity resulted in more accurate Complaints and thus less reduction of the penalty in the final Order. The Meetings also give us some insight into the types of defenses the facility is likely to raise.

I have discussed this issue with ORC, and I have determined that there is no legal impediment to proceeding with conducting these Meetings. We have actually held Meetings with two facilities - Westvaco and Holnam - on a trial basis, and both Meetings were very beneficial to the RCRA program. Most of our States hold such Meetings and several other Regions have also used them. The facility is not under any obligation to attend the Meeting, but we expect that most facilities will choose to do so.

With your approval, we intend to use the Show-Cause Meetings in the ways described below. However, we do not want to limit the use of the Show-Cause Meeting concept to just these cases.

- (1) Issue a Notice Of Violation (NOV) with notice of Show-Cause Meeting prior to drafting the Complaint. The NOV would contain a brief description of the alleged violation(s) so that the facility can prepare relevant information to bring to the Meeting. The facts gathered at the Meeting could assist EPA in crafting a better RCRA § 3007 Information

Request, and/or crafting an improved Complaint. Alternatively, EPA may gather information that indicates that we should not issue a Complaint. The Meeting prior to development of the Complaint could be helpful in complex regulatory cases, such as those involving recycling issues. Attached is an example of how we used the NOV/Show-Cause letter for the Westvaco Show-Cause Meeting.

- (2) Issue a NOV similar to above, but after the Complaint has been drafted. In this case, EPA would be more confident of the facts, but we still would give the facility an opportunity to tell us why they dispute the alleged violation(s). We would not distribute copies of the Draft Complaint because the facility might not focus on the alleged violations. In addition, findings from the Meeting could significantly change our understanding of the severity of the violations, which could alter the resulting penalty. We have not yet used the procedure described in this paragraph.

Depending on the circumstances of the case, EPA should use its discretion in disclosing the amount of the assessed penalty, or perhaps a less specific penalty "range", to the facility. It should be remembered that a Show-Cause Meeting is not the equivalent to an Informal Settlement Conference, and should not be used for negotiation of the facts or the penalty. However, there may be limited circumstances where an agreement can be reached, and settlement negotiations could begin.

The Show-Cause Meeting will be optional for the RCRA Compliance Section. There are instances where we would not want to delay the enforcement action, or where there is little to be gained by using the informal Meeting. The use of the Show-Cause process will be strictly at the discretion of the RCRA Compliance Section Chief. Implementation of the Show-Cause process will also be controlled by the RCRA Compliance Section Chief under the overall direction of the RCRA Branch Chief.

If you have any questions on this matter, please contact me. If you approve of the use of the Show-Cause Meetings in RCRA enforcement proceedings, please sign below.

Attachment

Approved: Joe R. Franzmathes
Joseph R. Franzmathes, Director
Waste Management Division

Date: AUG 03 1993

YELLOW

MAY 13 1993

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

4WD-RCRA

Mr. Wilson Gautreaux
Environmental Manager
Westvaco Corporation
P.O. Box 2941105
North Charleston, South Carolina 29411-2905

Re: Notice of Violation and
Opportunity to Show Cause

Dear Mr. Gautreaux:

On October 28, 1992, a comprehensive Compliance Evaluation Inspection was conducted at the Westvaco Corporation plant in North Charleston, South Carolina. Based on the information collected during this inspection, the United States Environmental Protection Agency (EPA) has determined that Westvaco Corporation is in violation of certain requirements of the Resource Conservation and Recovery Act (RCRA), 42 U.S.C. §§ 6901, et seq.

Specifically, EPA alleges that Westvaco Corporation has violated RCRA Section 3005, 42 U.S.C. § 9605, for operating a treatment, storage, and disposal facility without a permit or interim status. Section 3008(a) of RCRA, 42 U.S.C. § 9628(a), authorizes EPA to assess civil penalties for such violations of up to \$25,000 per day per violation.

You should have received an EPA inspection report which provides the basis for the violation discovered during the inspection. However, enclosed with this letter is an additional copy of the inspection report.

Westvaco has requested a meeting with EPA on May 26, 1993, at its Regional Office at 345 Courtland Street, Atlanta, Georgia. At this time, Westvaco will be given the opportunity to show cause why EPA should not take formal enforcement action against Westvaco in connection with the violation listed above, including the assessment of appropriate civil penalties. At this meeting, Westvaco will be allowed to present information relevant to 1) the factual bases for EPA's allegations and 2) factors that might mitigate penalties assessed for the violation. Westvaco should be prepared to provide relevant documentation of matters it presents at the meeting. EPA may consider information

provided in the meeting in civil or criminal proceedings related to this matter.

Westvaco may be represented by legal counsel. Due to the informal nature of the meeting, neither Westvaco nor EPA will be allowed to have the proceedings transcribed by a court reporter.

If you have any questions, please contact Mr. Larry Lamberth, the RCRA program person assigned to this matter, at 404/347-7603, or have your attorney contact Richard Glaze, Assistant Regional Counsel, at 404/347-2641, ext. 2274.

Sincerely yours,

Joseph R. Franzmathes
Director
Waste Management Division

Enclosure

cc: Hartsill Truesdale
South Carolina DHEC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

JAN 22 1986

Mr. Jerry Schneipp
The C.P. Hall Company
5851 West 73rd Street
Bedford Park, Illinois 60638
U.S. EPA ID#: ILT 180 010 340

Dear Mr. Schneipp:

This is in response to our phone conversation on January 16, 1986. During that conversation, you explained that the C.P. Hall Company has been operating under the United States Environmental Protection Agency (U.S. EPA) identification number: ILD 980 502 231 since January, 1983. You have received calls from Gregory Zak, Manager of the Compliance Assurance Unit, at the Illinois Environmental Protection Agency (IEPA) questioning why C.P. Hall Company has been using an identification number that does not exist in the Resource Conservation and Recovery Act (RCRA) computer printout supplied by the U.S. EPA to the IEPA.

I have pulled C.P. Hall's notification file and have found a copy of a letter sent from the U.S. EPA to C.P. Hall Company on December 14, 1982, which instructed your plant manager to convert to a new identification number: ILD 980 502 231. A copy of this letter is enclosed. The identification number change never took place. C.P. Hall Company has continued to be listed under: ILT 180 010 340 in our data base and in the computer printouts that we supply to IEPA. I believe that this is the basis for the confusion between C.P. Hall Company and the IEPA.

You have stated that you will use only the ILT 180 010 340 number in the future, and discontinue all use of ILD 980 502 231.

I will send a copy of this letter to Gregory Zak at the IEPA in an effort to prevent further problems with your manifests, annual reports and other hazardous waste management reports and documents required under Subtitle C of RCRA. If you find that you are in need of further assistance, please contact me at (312) 886-6142.

Sincerely,

Denise Baker
Environmental Protection Specialist

Enclosure

cc: Greg Zak, IEPA
Brian Newquist, IEPA



ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCKA ACTIVITIES

DEC 14 1982

MIXSON KARL J PLANT MANAG
HALL C P CO THE
7300 S CENTRAL AVENUE
BEDFORD PARK IL 60638
FACILITY: 5851 W 73RD ST
LOCATION: BEDFORD PARK IL 60638
ID NO.: ILT180010340

Dear Applicant:

RE: U.S. EPA Identification Number Change

This is to inform you that the United States Environmental Protection Agency (U.S. EPA) will be changing your temporary (T) identification number to a permanent (D) one. The label below shows your current temporary number as "OLD T NO." and the new permanent number as "NEW D NO."

OLD I.D. NO.: ILT180010340

~~NEW I.D. NO.: ILD980502231~~

DIDN'T CHANGE

In order to provide your facility with adequate time to convert to the permanent U.S. EPA identification number, we will make the change in our computer system effective January 1, 1983. This will allow you to use your temporary identification number until the end of the calendar year and, thus, cover all 1982 hazardous waste handled under one number for your annual report.

We have coordinated the identification number change with your State hazardous waste management office. The State has a listing of your old and new numbers.

Please contact Mr. Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions regarding this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Facility owner



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

10 NOV 1982



Mr. J. R. Klusendorf, Vice President and Treasurer
The C. P. Hall Company
7300 South Central Avenue
Chicago, Illinois 60638

RE: Withdrawal of Part A (Recycling)
FACILITY NAME: The C. P. Hall Company
USEPA ID NO.: ILT 180 010 340

Dear Mr. Klusendorf:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of September 16, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility uses, re-uses, recycles, or reclaims its waste as described in 40 CFR Part 261.6. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Recycling)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Mr. Karl J. Mixson, Plant Manager
IEPA



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

10 NOV 1982

(K)

Mr. J. R. Klusendorf, Vice President and Treasurer
The C. P. Hall Company
7300 South Central Avenue
Chicago, Illinois 60638

RE: Withdrawal of Part A (Recycling)
FACILITY NAME: The C. P. Hall Company
USEPA ID NO.: ILT 180 010 340

Dear Mr. Klusendorf:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of September 16, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility uses, re-uses, recycles, or reclaims its waste as described in 40 CFR Part 261.6. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Recycling)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Mr. Karl J. Mixson, Plant Manager
IEPA



UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V

111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

10 NOV 1982



Mr. J. R. Klusendorf, Vice President and Treasurer
The C. P. Hall Company
7300 South Central Avenue
Chicago, Illinois 60638

RE: Withdrawal of Part A (Recycling)
FACILITY NAME: The C. P. Hall Company
USEPA ID NO.: ILT 180 010 340

Dear Mr. Klusendorf:

This is to acknowledge that the United States Environmental Protection Agency (USEPA) has completed its review of your Part A Hazardous Waste Permit Application and your letter of September 16, 1982, requesting the withdrawal of your permit application. According to the information which you have submitted, your facility uses, re-uses, recycles, or reclaims its waste as described in 40 CFR Part 261.6. It is the opinion of this office, based on the information submitted, that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with all applicable State and local requirements.

You will retain your USEPA Identification number if you notified as a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawal of Part A (Recycling)," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

cc: Mr. Karl J. Mixson, Plant Manager
IEPA

The C. P. Hall Company

Established 1919

CHEMICALS FOR INDUSTRY

ANDERSON, SOUTH CAROLINA
CHICAGO, ILLINOIS
MEMPHIS, TENNESSEE
STOW, OHIO
TORRANCE, CALIFORNIA

7300 S. CENTRAL AVENUE
CHICAGO, ILLINOIS 60638

(312) 767-4600
(312) 458-2365
TWX 910-224-5102

RECEIVED

SEP 20 1982

WASTE MANAGEMENT BRANCH
EPA REGION V

September 16, 1982

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
United States Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

RE: Request for Information - Hazardous
Waste Permit Review (Recycling)
FACILITY: The C. P. Hall Company
5851 West 73rd Street
Bedford Park, Illinois 60638
USEPA ID NO: ILT 180 010 340 C, PA

Dear Mr. Klepitsch:

This is to acknowledge receipt of your letter of August 20, 1982 requesting further clarification that would preclude this location requiring a permit under paragraph 3005 of RCRA, as amended.

We do recycle, reclaim for our use or for resale about 99 percent of our "waste" streams at the present time and we have been doing this prior to November 19, 1980. The remaining one percent is removed from the waste treatment system through the use of a rotary vacuum filter coated with diatomaceous earth and then removed from our premises by a waste disposal company in less than a 90-day period.

Therefore, as detailed in 40 CFR, Part 262.34 all of the waste generated for disposal is held for less than 90 days and we are therefore exempt. The balance is beneficially recycled for resale and this is covered as an exclusion and therefore, not regulated under 40 CFR, Part 261.6. Also since none of our materials are subject to 40CFR265, we are not filing a closure plan.

RECEIVED
9/24/82

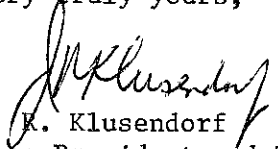
Mr. Karl J. Klepitsch

-2-

September 16, 1982

In summation, therefore, we are requesting a withdrawal of our permit application. In addition, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Very truly yours,


J. R. Klusendorf
Vice President and Treasurer

JRK:dlm

To Not & in

The C. P. Hall Company

Established 1919

CHEMICALS FOR INDUSTRY

7300 S. CENTRAL AVENUE

CHICAGO, ILLINOIS 60638

ANDERSON, SOUTH CAROLINA
CHICAGO, ILLINOIS
MEMPHIS, TENNESSEE
STOW, OHIO
TORRANCE, CALIFORNIA

(312) 767-4600
(312) 458-2385
TWX 910-224-5102

June 27, 1983

ILT180010340 G, PA ✓
ILD0004163283

RECEIVED
FEDERAL GOVERNMENT
DATE 7/12/83

Mr. Kenneth P. Bechely
Northern Region Manager
Field Operations Section
Division of Land Pollution Control
Illinois Environmental Protection Agency
1701 First Avenue
Maywood, Ill. 60153

RECEIVED
JUL 15 1983

WASTE MANAGEMENT
BRANCH

Dear Mr. Bechely:

On May 11, 1983 a representative of the Illinois Environmental Protection Agency (IEPA) conducted an inspection of our facility. In the process of inspection I had an opportunity to review with Ms. Bonnie Eleder, the IEPA representative, our overall waste generating activity and was advised that our facility is presently not regulated under 35 Ill. Adm. 720 through 725.

Therefore, we request that our EPA Form 8700-12 Notification of Hazardous Activity be withdrawn.

Presently we have 3 hazardous waste permit numbers as follows:

PERMIT NO.	EXPIRES
820540-19704502	3/30/86
830134-03103901	2/ 1/86
992582	5/29/85

Your cooperation will be of great help to us. If you have any questions, please feel free to call me.

Sincerely,

RECEIVED
7/10/83

Seung N. Tae

Seung Nam Tae
Project Engineer
C. P. Hall Company

SNT:sw

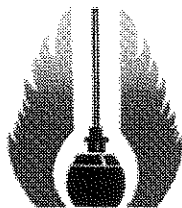
CC: USEPA

230 S. Dearborn St.
Chicago, Ill. 60604

Welcome to The C.P. Hall Company. Move the cursor over your area of interest and click.



products



about



locations

The C.P. Hall Company

[Products] [About C.P. Hall] [Locations]

The C. P. Hall Company is a leading supplier of plasticizers and performance additives to the polymer industries, worldwide. The company's products are used extensively in rubber, plastics, adhesives, coatings, personal care and specialized industrial applications.

The company is both the major producer of polyester polymeric plasticizers and specialty ester plasticizers in the U.S. as well as a significant distributor and reseller of plasticizers and additives for its target markets in the U.S. and internationally.

The company's corporate headquarters, technical service center and international operations are located in Chicago. Domestic markets and customers are served through four order centers and local warehousing operations. Production is carried out at three manufacturing facilities in the U.S.

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- Our Commitment to Responsible Distribution
- Contact Us



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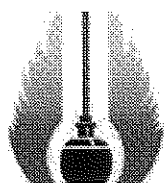


CHEMICAL
MANUFACTURERS
ASSOCIATION



National
Association of
Chemical
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The C.P. Hall Company

Product Guide

The C. P. Hall Company offers a wide range of esters serving a variety of industrial applications. Of major interest are those esters used as plasticizers, softeners, extenders and lubricants, which we manufacture to the highest quality standards. We like to call ourselves "the plasticizer people." To support and expand our ester business, we have developed a broad technical awareness of the use of our products in a wide variety of industrial applications and polymer systems.

Esters For Industry

- Rubber
- Flexible PVC
- Adhesives
- Coatings
- Lubricants

Product Lines and Tradenames

Plasticizer List

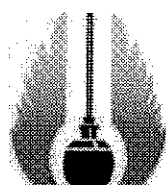
Plasticizer Selection **NEW!**



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The C. P. Hall Company

PRODUCT LINES and TRADENAMES

Table of Product Lines and Tradenames

Name	Application/End Use
CPH	Specialty Esters
E/Z MIXtm	Liquid concentrate plasticizers in dry form
HALLCO®	Fatty acid esters
HALLCO® LUBE	Specialty elastomer release coatings
HALLCOMID®	Specialty amides
HALLCOTE®	Specialty elastomer release coatings
MAGLITE®	Magnesium oxides
MARINCO®	Magnesium hydroxides
MONOPLEX®	Monomeric plasticizers for polymers and elastomers
PEPTIZERtm	Chemical plasticizers for rubber processing
PLASTHALL®	Monomeric and polymeric plasticizers for polymers and elastomers
PARAPLEX®	Polymeric plasticizers for polymers and elastomers
QUIKOTE®	Specialty elastomer release coatings
RGA RESINStm	Plasticizing resin modifiers for inks and coatings
SLAB DIPtm	Specialty elastomer release coatings
STAFLEX®	Monomeric plasticizers for polymers, elastomers and personal care
SUPRMIX®	Liquid concentrate plasticizers in dry form
TegMeR®	Specialty ester plasticizers
UrethHALL®	Polyester polyols and glycols
ZINCOTE®	Specialty elastomer release coatings



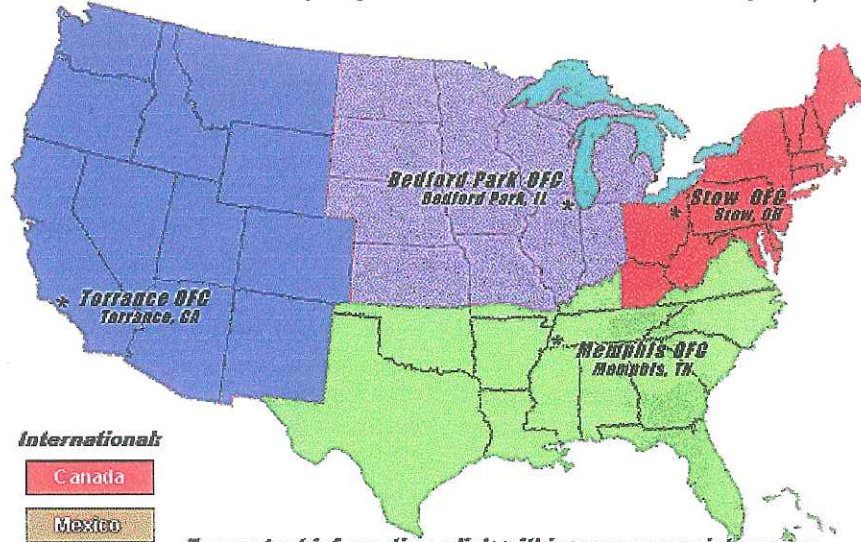
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The C.P. Hall Company

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drum storage
inspection
record

CPHALL
16 Aug 99

ATT 3

~~to Heat~~ -

7/28/99

Acetone - 6

Methanol - 1 1/2

Isopropyl - 2

Denatured - 6

Hexane - 2

Checked for spills. No spills. Sff.

8/2/99

Acetone - 5

Methanol - 1 1/2

Isopropyl - 2

Denatured - 6

Hexane - 2

Xylene - 1

Checked for spills. No spills.

CP Hall
16 Aug 99

8/10/99

checked for spills. No spills. *SH*

Acetone - 2

Methanol - 2

Isopropyl - 2

Denatured - 5

Hexane - 2

Xylene - $\frac{1}{2}$

8/16/99

checked for spills. No spills. *SH*

C.P. HALL 16 AUG 99

ATT 4

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Part 722: Standards Applicable to Generators of Hazardous Waste (> 1000 Kg/mo.)	
	Subpart A: General	
	Section 722.111: Hazardous Waste Determination	
722.111	Has the generator correctly determined if the solid waste(s) it generates is a hazardous waste? <i>product knowledge</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.111
	Have hazardous wastes been identified for purposes of compliance with Part 728? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
808.121	Has the generator correctly determined if the solid waste(s) it generates is a special waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	808.121
	Section 722.112: USEPA Identification Numbers	
722.112(a)	Has the generator obtained a USEPA identification number? <i>confused</i> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(a)
722.112(c)	Has the generator offered its hazardous waste only to transporters or to treatment, storage or disposal facilities that have a USEPA identification number? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.112(c)
	Subpart B: The Manifest	
	Section 722.120: General Requirements	
722.120(a)	Does the facility manifest its waste off-site? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(a)
	If "No", proceed to Section 722.120(e).	
722.120(b)	Does the manifest designate a facility permitted to handle the waste? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.120(b)
722.120(d)	Has the generator shipped any waste that could not be delivered to the designated facility? Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.120(d)
	Section 722.121: Acquisition of Manifests	
	Has the generator used:	
722.121(a)	- an Illinois manifest for wastes designated to a facility within Illinois? Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/>	722.121(a)
722.121(b)	- a manifest from the State to which the manifest is designated? <i>Indiana PCI</i> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input checked="" type="checkbox"/>	722.121(b)
	- an Illinois manifest if the State to which the waste is designated has no manifest of its own? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	Section 722.122: Number of Copies	
722.122	Does the manifest consist of at least 6 copies? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.122
	Section 722.123: Use of the Manifest	
	For each manifest reviewed, has the generator:	
722.123(a)	- signed the certificate by hand? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(a)
	- obtained the handwritten signature and the date of acceptance by the initial transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- retained one copy as required by Section 722.140(a)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	- apparently sent a copy (part 5 for the Illinois manifest) to the Agency within 2 working days? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
123(b)	- has the generator apparently given the remaining copies to the transporter? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	722.123(b)

THY

Regulation

RCRA GENERATOR INSPECTION CHECKLIST (PART 722)

Violation

722.123(c)

— has the generator followed the procedures prescribed in Section 722.123 for manifesting bulk shipments of hazardous waste by rail or water?

Yes ☐No ☐N/A ☒

722.123(c)

Subpart C: Pre-Transport Requirements

Is there any hazardous waste ready for transport off-site?

Yes ☒No ☐N/A ☐

If so, is the generator complying with the pre-transport requirements in Subpart C?

*tanks?**drums:*Yes ☒No ☐N/A ☒**Section 722.134: Accumulation Time**

722.134(a)

Has the generator complied with the following requirements:

Yes ☐No ☐N/A ☐

722.134(a)

722.134(a)(1)

For waste in containers, has the generator complied with the requirements of Part 725, Subpart I?

Yes ☒No ☐N/A ☐

and/or

For waste in tanks, has the generator complied with the requirements of Part 725, Subpart J (except Sections 725.297(c) and 725.300)?

*Co. says tanks are not subject. does not provide*Yes ☐No ☒N/A ☐

722.134(a)(2)

For waste in containers, has the generator marked and made visible for inspection on each container, the date upon which accumulation began?

could not be seen in bin Yes ☐No ☐N/A ☐

722.134(a)(3)

For waste in containers and tanks, has the generator marked or labeled each with the words "Hazardous Waste"?

Yes ☒No ☐N/A ☐

722.134(a)(4)

Has the generator complied with the requirements of Part 725, Subparts C and D, and Sections 725.116 and 728.107(a)(4)?

*no training records*Yes ☐No ☐N/A ☐

Specifically, the requirements of items 1 and/or 4 above (listed by regulation) which need to be complied with are as follows:

Does the facility accumulate hazardous waste in containers?

Yes ☒No ☐N/A ☐

If "No", go to Subpart J.

STG

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Regulation

RCRA GENERATOR INSPECTION CHECKLIST (PART 722)

Violation

Subpart I: Use and Management of Containers

Has the generator closed an accumulation area?

Yes ☐ No ☒ N/A ☐

(725.211) If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?

(725.214) Yes ☐ No ☐ N/A ☒

(725.271) If the containers have leaked or are in poor condition, has the owner/operator transferred the hazardous waste to a suitable container?

Yes ☐ No ☐ N/A ☒

(725.272) Is the waste compatible with the container and/or liner?

Yes ☒ No ☐ N/A ☐

(725.273a) Are containers of hazardous waste always closed except to remove or add waste during accumulation?

Yes ☒ No ☐ N/A ☐

(725.273b) Are containers of hazardous waste being opened, handled, or stored in a manner which will prevent the rupture of the container or prevent it from leaking?

Yes ☒ No ☐ N/A ☐

(725.274) Is the owner/operator inspecting the accumulation area(s) at least weekly, looking for leaks or deterioration?

Yes ☒ No ☐ N/A ☐

Is the accumulation area free from any evidence of leaking or deteriorating containers? (See also Section 725.131)

Yes ☒ No ☐ N/A ☐

(725.276) Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?

Yes ☒ No ☐ N/A ☐

Note: See Section 725.117(a) for additional requirements for ignitable, reactive or incompatible wastes.

(725.277) Is the owner/operator complying with the requirements concerning incompatible wastes?

Yes ☐ No ☐ N/A ☒

Comments:

drums were in plastic containers with threaded lids, HW label could not be seen well enough to check date.

Does the generator accumulate and/or treat hazardous waste in tanks?

product/waste ☒ Yes ☒ No ☐ N/A ☐

Note: If "No", go to Subpart C.

CO, believes tanks are not subject

FFS

Subpart J: Tank Systems

Has the generator closed an accumulation area?

Yes No ✓N/A

(725.211)

If "Yes", was the accumulation area closed in accordance with Sections 725.211 and 725.214?

Yes No N/A

(725.214)

(725.290)

Does the facility accumulate or treat hazardous waste in tanks?

Yes No N/A

If "No", skip Subpart J.

a) Tank systems that are used to accumulate or treat hazardous waste which contains no free liquids (using the Paint Filter Liquids Test) and that are situated inside a building with an impermeable floor are exempted from the requirements in Section 725.293.

b) Tank systems, including sumps, that serve as part of a secondary containment system to collect or contain releases of hazardous wastes are exempted from the requirements in Section 725.293(a).

c) Tanks, sumps and other collection devices used in conjunction with drip pads (as defined in Section 720.110) and regulated under Subpart W, must meet the requirements of this Subpart.

(725.291a)

For tanks existing prior to July 14, 1986 (see definition of tank system under 720.110) and not protected by a secondary containment system, has a written assessment been reviewed and certified by an IRPE(*) in accordance with Section 702.126(d) by January 12, 1988 [except as provided in Section 725.291(c)]? 7, dates

Yes No N/A

(725.291b)

Does this assessment consider at least the following:

1) design standards for the tank and ancillary equipment?

Yes No N/A

2) hazardous characteristics of the wastes?

Yes No N/A

3) existing corrosion protection measures?

Yes No N/A

4) documented age of the tank system?

Yes No N/A

5) results of a leak test, internal inspection, or other tank integrity examination?

Yes No N/A

(725.291c)

Has a tank system assessment been performed within 12 months after the materials in the tank become a hazardous waste? 7Yes No N/A

Note: If an assessment indicates a tank system is leaking or unfit for use, the owner/operator must comply with the requirements of Section 725.291(b)(5).

(725.292a)

For new tanks (see definition of new tanks under Section 720.110) whose installation commenced after 7/14/86, has a written assessment been reviewed and certified by an IRPE in accordance with Section 702.126(d) prior to operation of the tank system?

Yes No N/A

Does the assessment include, at a minimum, the following:

1) design standards for tanks and ancillary equipment?

Yes No N/A

2) hazardous characteristics of the waste(s) to be handled?

Yes No N/A

3) evaluation of potential for corrosion and corrosion protection measures for tank systems with metal components in contact with soil or water?

Yes No N/A

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<p>4) design or operational measures that will protect underground tank systems from potential damage resulting from vehicular traffic? Yes _____ No _____ N/A _____</p> <p>5) designs to ensure adequate foundations, anchoring to prevent flotation or dislodgement and the ability to withstand the effects of frost heave? Yes _____ No _____ N/A _____</p>	
(725.292g)	<p>Has the owner/operator obtained and kept on file at the facility the written statements, including the certification statements [as required in Section 702.126(d)] of the design and installation requirements of Subsections (b) through (f)? Yes _____ No _____ N/A _____</p>	
(725.293a)	<p>Is secondary containment provided for any new tank system before being put into service? Yes _____ No _____ N/A _____</p> <p>Does an existing tank, used to accumulate F020, F021, F022, F023, F026 or F027 waste(s), have secondary containment by 1/12/89? Yes _____ No _____ N/A <u> </u></p> <p>For an existing tank of documentable age, is secondary containment provided by 1/12/89 or when the tank is 15 years old, whichever is later? Yes _____ No _____ N/A _____</p> <p>For an existing tank of undocumentable age, has secondary containment been provided by 1/12/95? Yes _____ No _____ N/A _____</p> <p>or if the facility is older than 7 years, by the time the facility reaches 15 years of age or 1/12/89, whichever is later? Yes _____ No _____ N/A _____</p> <p>For tanks that accumulate wastes that become hazardous after 1/12/87, has secondary containment been provided within the time intervals required in Subsections (a)(1) through (a)(4) substituting the date that a material becomes a hazardous waste for 1/12/87? Yes _____ No _____ N/A _____</p>	
(725.293b)	<p>Is the secondary containment system designed, installed and operated to prevent migration of wastes or accumulated liquid out of the system at any time? Yes _____ No _____ N/A _____</p> <p>Is the secondary containment system capable of detecting and collecting releases and accumulated liquids until the collected material is removed? Yes _____ No _____ N/A _____</p>	
(725.293c)	<p>To meet the requirements of Subsection (b), is the secondary containment system:</p> <p>1) compatible with the waste(s) in the tank and of sufficient strength and thickness to prevent failure? Yes _____ No _____ N/A _____</p> <p>2) placed on a foundation or base capable of providing support, providing resistance to pressure gradients and preventing failure due to settlement, compression or uplift? Yes _____ No _____ N/A _____</p> <p>3) provided with a leak detection system designed and operated to detect any release or accumulated liquid within 24 hours? Yes _____ No _____ N/A _____</p> <p>4) sloped or otherwise designed or operated to drain and remove liquids resulting from leaks, spills or precipitation? Yes _____ No _____ N/A _____</p> <p>and is spilled or leaked waste and accumulated precipitation removed from the secondary containment within 24 hours? Yes _____ No _____ N/A _____</p>	
<p>Note: A RCRA permit may allow for removal of liquids less frequently than 24 hours after accumulation.</p>		

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
(725.293d)	<p>Does the secondary containment for tanks have one or more of the following:</p> <p>1) a liner (external to the tank); or</p> <p>2) a vault; or</p> <p>3) a double-walled tank; or</p> <p>4) an equivalent device (approved by the Board)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293e)	<p>Does the external liner system(s), vault system(s) and/or double-walled tank(s) meet the additional requirements identified in Section 725.293(e)?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293f)	<p>Is ancillary equipment protected by secondary containment that meets the requirement of Subsection (h) and (c) except for:</p> <p>1) aboveground piping (exclusive of flanges, joints, valves and connections) that are inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>2) welded flanges, joints and connections that are inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) sealless or magnetic coupling pumps and sealless valves that are inspected daily?</p> <p>Yes _____ No _____ N/A _____</p> <p>4) pressurized aboveground piping systems with automatic shut-off devices that are inspected daily?</p> <p>Yes _____ No _____ N/A _____</p>	
(725.293i)	<p>Until such time as secondary containment is provided, are the following requirements being met for all tank systems:</p> <p>1) For non-enterable underground tanks, has an annual leak test that meets the requirements of 725.291(b)(5) been conducted?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p> <p>2) For other than non-enterable underground tanks and ancillary equipment, has an annual leak test, internal inspection or other tank integrity examination by an IRPE been conducted?</p> <p>Yes _____ No _____ N/A _____</p> <p>3) Are written records maintained at the facility to document the assessments required under Subsections (i)(1) and (i)(2)?</p> <p>Yes _____ No _____ N/A _____</p> <p>Note: If a tank system is found to be leaking or unfit for use as a result of a leak test or assessment, the owner/operator must comply with Section 725.296</p>	
(725.294a)	<p>Has the owner/operator placed hazardous wastes or treatment reagents in the tank system that could cause the system to rupture, leak, corrode or otherwise fail?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.294b)	<p>Do tanks and secondary containment have appropriate controls and practices to prevent spills and overflows including:</p> <p>1) spill prevention controls?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>2) overfill prevention controls?</p> <p>Yes <input checked="" type="checkbox"/> No _____ N/A _____</p> <p>3) sufficient freeboard in uncovered tanks?</p> <p>Yes _____ No _____ N/A <input checked="" type="checkbox"/></p>	
(725.294c)	<p>Note: If a leak or spill has occurred in the tank system, the owner/operator shall comply with the requirements of Section 725.296.</p>	

Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
75.295a)	Does the owner/operator inspect, if present, at least each operating day, the following: <ul style="list-style-type: none"> 1) overfill/spill control equipment? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> </div> 2) the aboveground portion of the tank system for corrosion or releases? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> </div> 3) data from monitoring equipment? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div> 4) the construction materials and the area immediately surrounding the external portion of the system? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div> 	?
(725.295b)	If the tank system has cathodic protection, is the owner/operator complying with Section 725.295(b) to ensure that they are functioning properly? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
(725.295c)	Does the owner/operator document in the operating record, the results of tank inspections as required in Section 725.295(a) and (b)? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A <input type="checkbox"/> </div>	
(725.296)	If the tank system or secondary containment system has a leak or spill or is unfit for use, has the owner/operator: <ul style="list-style-type: none"> a) immediately ceased using; prevented flow or addition of waste and inspected the system to determine the cause of the release? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div> b) removed applicable waste from the system within 24 hours of detection? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div> c) immediately conducted a visual inspection of the release and taken actions to contain visible releases to the environment, prevented further migration to soils or surface water and removed and properly disposed of any contaminated soil or water? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div> 	
25.296d)	d) notified the Agency within 24 hours of detection of release? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
	d)3) within 30 days of detection of release, submitted a report to the Agency that complies with the requirements of Section 725.296(d)(3)? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
	Note: Notification and reports are not necessary if less than 1 pound of material is spilled and it was immediately contained and cleaned up.	
(725.296e)	e) repaired the tank system prior to returning the tank system to service in the event that a leak has occurred from the primary tank system into the secondary containment system? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
	e)4) provided secondary containment before returning a tank system to service in the event that the release was from a component of a tank system without secondary containment? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
	e)4) met the requirements for a new tank system in the event that a component is replaced during repair? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
	e)4) provided the entire component with secondary containment prior to being returned to use in the event that a leak has occurred in any portion of a component that is not readily accessible for visual inspection? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	
(725.296f)	f) In the event that an extensive repair has been conducted in accordance with subsection (e), submitted to the Agency within 7 days after returning the tank system to use, a certification by an IRPE stating that the repaired system is capable of handling hazardous wastes without release for the intended life of the system? <div style="display: flex; justify-content: space-between;"> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> </div>	

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<p>Note: If the owner/operator does not satisfy the requirements of subsections (e)(2) through (e)(4), the tank system must be closed in accordance with Section 725.297.</p>	
(725.297a)	<p>At the time of closure of a tank system, has the owner/operator removed or decontaminated all waste residues, contaminated components, contaminated soils and structures and equipment and managed them as hazardous waste [unless Section 721.103(d) applies]?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.297a)	<p>Have the closure plan, closure activities, cost estimates for closure and financial responsibility for tank systems met all requirements specified in Subparts G and H?</p> <p>Yes _____ No _____ N/A <u>X</u></p>	
(725.297b)	<p>If the tank system cannot be "clean" closed, has the owner/operator closed the tank system and performed post-closure care in accordance with the closure and post-closure care requirements that apply to landfills (Section 725.410)?</p> <p>Yes _____ No _____ N/A <u>X</u></p> <p>Note: Such a tank system is considered a landfill and must meet all of the requirements of landfills specified in Subparts G and H.</p>	
(725.298a)	<p>Are ignitable or reactive wastes placed in a tank system?</p> <p>Yes <u>✓</u> No _____ N/A _____</p> <p>If "No", skip to Section 725.299.</p> <p>Is the waste treated, rendered or mixed before or immediately after placement in the tank system so that:</p> <ul style="list-style-type: none"> the resulting waste, mixture or dissolved material is no longer ignitable or reactive? <p>Yes _____ No <u>✓</u> N/A _____</p> <ul style="list-style-type: none"> Section 725.117(b) is complied with? <p>Yes _____ No _____ N/A _____</p> <p>or</p> <p>Is the waste accumulated or treated so that it is protected from any material or conditions which may lead to ignition or reaction?</p> <p>Yes <u>X</u> No _____ N/A _____</p> <p>or</p> <p>Is the tank used solely for emergencies?</p> <p>Yes _____ No <u>✓</u> N/A _____</p>	
(725.298b)	<p>Is the facility complying with the requirements regarding maintenance of protective distances between the waste management area and any public ways, streets, alleys or any adjoining property line?</p> <p><i>forks in building</i> Yes <u>✓</u> No _____ N/A _____</p>	
(725.299)	<p>Are incompatible wastes/materials placed in the same tank?</p> <p>Yes _____ No <u>✓</u> N/A _____</p> <p>If "No", skip to Section 725.300.</p> <p>Is Section 725.117(b) being complied with?</p> <p>Yes _____ No _____ N/A _____</p> <p>Has the tank system been properly decontaminated if it previously held an incompatible waste/material unless Section 725.117(b) is complied with?</p> <p>Yes _____ No _____ N/A <u>✓</u></p>	
<p>COMMENTS:</p>		

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	Subpart C: Preparedness and Prevention	
725.131)	Is the facility being operated and maintained to minimize the possibility of a fire, explosion or any release of hazardous waste or hazardous waste constituents which could threaten human health or the environment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.132)	Is the facility equipped with the following, if necessary: a) an internal communication or alarm system(s)? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) a telephone or other device to summon emergency assistance from local authorities? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> c) portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> d) water at adequate volume and pressure for fire control? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.133)	Is the facility testing and maintaining communication/alarm system(s), fire protection equipment, spill control equipment and decontamination equipment? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.134)	a) Where hazardous waste is being handled, do all employees have immediate access to an internal alarm or other emergency communication device? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> b) If there is ever just one employee on the premises when the facility is operating, does he/she have immediate access to a device capable of summoning external emergency assistance? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
(725.135)	Is the facility maintaining adequate aisle space? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
725.137)	Has the facility attempted to make the following arrangements, as appropriate, for the type of facility and waste: - arrangements with local emergency authorities (i.e. police and fire departments, other emergency response agencies) to familiarize them with the layout of the facility, properties of hazardous waste handled, places where facility personnel would be working, entrances to roads inside the facility and evacuation routes? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements designating the primary authority where more than one police or fire department might respond? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - agreements with State emergency response teams, contractors and equipment suppliers? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the type of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	Subpart D: Contingency Plan and Emergency Procedures	
(725.151a)	Is the contingency plan available? Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> If "No", skip to Section 725.155. Is the plan designed to protect human health and the environment from releases to the air, soil and water? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
725.151b)	Has there been a fire, explosion or release of hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/> If "Yes", has the contingency plan been carried out immediately? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input checked="" type="checkbox"/>	
	(GEN-9)	

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Regulation

RCRA GENERATOR INSPECTION CHECKLIST (PART 722)

Violation

(725.152a)	Does the plan describe the actions required for response to:			
	- fires?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- explosions?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- releases?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.152c)	Does the plan describe arrangements with:			
	- police and fire departments?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- hospitals?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- contractors?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- emergency response teams?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.152d)	Does the plan contain the current emergency coordinator's name, phone (office and home) and address?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.152e)	Does the plan identify all emergency equipment including:			
	- description?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- capability?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- location?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is the list of emergency equipment up-to-date?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.152f)	Does the plan include:			
	- an evacuation plan?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- an evacuation signal?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- alternate evacuation routes?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.153)	Has the contingency plan (including all revisions) been:			
	a) maintained at the facility?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b) submitted to:			
	- police department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- fire department?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- hospital?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	- emergency response teams?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.154)	Has the contingency plan been reviewed and revised whenever:			
	a) regulations are revised?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	b) the plan fails in an emergency?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	c) the facility changes in a way that modifies the emergency response necessary?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	d) information regarding emergency coordinators changes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	e) information regarding equipment changes?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.155)	Is the emergency coordinator on-site or on call at all times?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Is the emergency coordinator familiar with all facility activities, wastes, records, layout and contingency plan?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
	Does the emergency coordinator have the authority to commit the resources needed to carry out the actions specified in the contingency plan?	Yes <input type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
(725.156)	If the facility has had a release, fire or explosion, have the procedures of this Section been followed regarding assessment, response and reporting?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	N/A <input type="checkbox"/>

Note: If the facility has had a release, explain in detail.

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
	<p>Section 725.116: Personnel Training</p> <p>Does the facility have a training program? <i>apparently not</i> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Have facility personnel successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of Part 725? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Is the program directed by a person trained in hazardous waste management procedures? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program teach facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/></p> <p>Does the program cover, at a minimum:</p> <ul style="list-style-type: none"> - procedures to familiarize facility personnel with emergency procedures, emergency equipment and emergency systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - key parameters for automatic waste feed cut-off systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - communications or alarm systems? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to fire or explosions? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - response to groundwater contamination incidents? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> - shutdown of operations? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/> 	
(725.116b)	Have new employees completed the program within 6 months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.116c)	Have facility personnel received an annual review of the initial training? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.116d)	Are the following documents and records being maintained at the facility:	
	1) the job title for each position related to hazardous waste management and the name(s) of the employee(s) filling each job? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	2) a written job description for each position above, including the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	3) a written description of the type and amount of both initial and continuing training that will be given to each person filling a position dealing with hazardous waste management? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
	4) records documenting that the training or job experience has been given to and completed by facility personnel? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	
(725.116e)	Is the facility maintaining training records until closure of the facility and those of former employees for at least 3 years from the last date of employment? Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>	

Regulation

RCRA GENERATOR INSPECTION CHECKLIST (PART 722)

Violation

Section 728.107: Waste Analysis and Recordkeeping

(728.107a4)

Has the generator who treats a prohibited waste in tanks or containers in order to meet the treatment standards developed and followed a waste analysis plan?

Yes No N/A

Is the plan on-site?

Yes No N/A

Does the plan include a detailed physical and chemical analysis?

Yes No N/A

Has the plan been filed with the Agency at least 30 days prior to commencement of treatment activity?

Yes No N/A

Has the generator submitted the required notification and certification that the waste meets treatment standards when the waste is shipped off-site?

Yes No N/A

Subsection 722.134(c): Satellite Accumulation

722.134(c)

Is the generator who accumulates hazardous waste at or near any point of generation where wastes initially accumulate and which is under the control of the operator of the process generating the waste limiting such accumulation to 55 gallons of hazardous waste or 1 quart of acutely hazardous waste marking the containers with the words "Hazardous Waste" or other words identifying the contents?

Yes No N/A 4

Has the generator who accumulates more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste complied with the requirements of Section 722.134(a) within 3 working days?

Yes No N/A *1*

If there are more than 55 gallons of hazardous waste or 1 quart of acutely hazardous waste in the satellite accumulation area, are the containers marked with the date accumulation began?

Yes No N/A ☒

During the 3 day period, is the generator continuing to comply with the requirements of Section 722.134(c)(1) with respect to the excess waste?

Yes No N/A ☒

Subpart D: Recordkeeping and Reporting

Section 722.140: Recordkeeping

722.140(a)

Has the generator retained for a period of 3 years:

- a copy of each signed manifest?

Yes ☒ No ☐ N/A ☐

722.140(b)

Has the generator retained a copy of each Annual Report and Exception Report for a period of at least three years from the due date of the report (March 1)?

Yes ☒ No ☐ N/A ☐

722.140(c)

Has the generator retained for a period of 3 years:

- copies of test results, waste analyses or other determinations made in accordance with Section 722.111?

Yes No N/A

722.140(d)

Does a generator who is involved in any unresolved enforcement action or as requested by the Director continue to maintain the records required in subsections a) and c)?

Yes No N/A ☒

Section: 722.141: Annual Reporting

722.141(a)

Has the generator who ships hazardous waste off-site for treatment, storage or disposal filed an annual report with the Agency by March 1 for the preceding calendar year?

Yes ☒ No ☐ N/A ☐

Note: If "No", or if deficiencies are noted with the annual report reviewed, contact the Planning and Reporting Section.

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Regulation	RCRA GENERATOR INSPECTION CHECKLIST (PART 722)	Violation
722.141(b)	Has the generator who treats, stores or disposes of hazardous waste on-site, filed an annual report with the Agency by March 1 for the preceding calendar year? Yes _____ No _____ N/A <u>X</u>	722.141(b)
	Section 722.142: Exception Reporting	
722.142(a)(1)	If the generator has not received a copy of the manifest from the TSD facility within 35 days of the date of delivery to the transporter, has the generator contacted the transporter or the TSD facility to determine the status of the hazardous waste? Yes _____ No _____ N/A _____	722.142(a)(1)
722.142(a)(2)	If the generator has not received a copy of the signed manifest within 45 days of the date of delivery to the transporter, has he filed an exception report with the Agency in accordance with the requirements of this Section? Yes _____ No _____ N/A _____	722.142(a)(2)
	Section 722.143: Additional Reporting	
722.143	Has the generator furnished additional reports as required by the Director? Yes _____ No _____ N/A <u>X</u>	722.143
	Subpart E: Exports of Hazardous Waste	
	Is the generator an exporter of hazardous waste? Yes _____ No _____ N/A <u>X</u>	
	If "Yes", has the generator complied with the requirements of Subpart E? Yes _____ No _____ N/A _____	
	Subpart F: Imports of Hazardous Waste	
	Is the generator an importer of hazardous waste? Yes _____ No _____ N/A <u>X</u>	
	If "Yes", has the generator complied with the requirements of Subpart F? Yes _____ No _____ N/A _____	
	Subpart G: Farmers	
	Is the generator a farmer? Yes _____ No _____ N/A <u>X</u>	
	If "Yes", has the generator complied with the requirements of Subpart G? Yes _____ No _____ N/A _____	
	Comments:	

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ILLINOIS Environmental Protection Agency
1998 Hazardous Waste Report
Form IC -- Identification and Certification

ATT 5

Instructions for this form found on pages 11-16

This form must be completed for the location shown on the above label. If you need additional forms for other locations, call IEPA.

SECTION 1. GENERATOR STATUS

A. 31 1 RCRA Generator Status (enter one code)

- 1 = LQG
2 = SQG Skip to Box C
3 = CESGQ
4 = Nongenerator (continue to Box B)

B. Reason for not generating (Check all that apply)

- 32 ☐ Never generated
33 ☐ Out of business
34 ☐ Only excluded or delisted waste generated
35 ☐ Only non-hazardous waste generated

- 36 ☐ Periodic generator, none in reporting year
37 ☐ Waste minimization activity
38 ☐ Other (specify in comments box)

C. 39 ☐ Status Time Period: 1 = Expected to be the same next year and following years 2 = Expected to change next year

SECTION 2. ENTER THE SIC CODE(S) FOR THIS LOCATION

40 2 8 6 9 44 48 52

SECTION 3. ON-SITE WASTE MANAGEMENT STATUS (enter one code for each question)

- A. 56 1 RCRA regulated (permitted or interim status) storage
B. 57 1 RCRA permitted or interim status treatment, disposal, or recycling
C. 58 1 Treatment, disposal, or recycling exempt from RCRA permit requirements

SECTION 4. WASTE MINIMIZATION ACTIVITY DURING THE REPORTING YEAR. (Only LQGs are required either to complete Section IV or submit detailed waste minimization description (see page 3).)

A. 59 Y Does your facility have a waste minimization plan or organized approach to investigate source reduction and recycling opportunities? Enter Y for Yes (Continue to Question B) or N for No (Skip to Question C)

B. Enter Y (Yes) for all activities that describe your waste minimization program.

- a. 60 ☐ Set a waste minimization goal
b. 61 Y Use team approach for planning
c. 62 ☐ Provide employee training
d. 63 Y Identify types and amounts of waste generated by various processes and their causes
e. 64 Y Assess total costs of waste management
f. 65 Y Prioritize waste minimization options based on costs, benefits and feasibility
g. 66 ☐ Periodically update the program and re-evaluate options
h. 67 Y Encourage employees to offer waste minimization suggestions
i. 68 ☐ Incorporate waste minimization into procurement, marketing and product development activities
j. 69 ☐ Other (describe in comments box)

C. What kind of incentives would you like to see developed to help promote more source reduction activity at your facility? Enter Y (Yes) for all that apply.

- a. 70 ☐ Tax incentives
b. 71 ☐ Loan assistance for equipment
c. 72 Y Compliance flexibility
d. 73 ☐ On-site technical assistance
e. 74 ☐ Regulatory compliance assistance
f. 75 ☐ Employee training
g. 76 ☐ R&D assistance
h. 77 ☐ Expedited permit review
i. 78 ☐ Other (enter comments on separate page)

D. Would you like to receive information on waste minimization? Enter Y (Yes) for information requested.

- a. 79 ☐ On-site technical consultation with IEPA
b. 80 ☐ On-site technical consultation with Illinois Waste Management and Research Center

Comments: 83 ☐ Enter Y (Yes) if you have comments regarding this page and attach extra sheet.

Section 5. The Environmental Protection Agency is authorized to require this information under the Illinois Compiled Statutes ("ILCS"), 1994 as amended, Chapter 415 ILCS 5/4 and 21. Disclosure of this information is required. Failure to disclose this information may result in civil and criminal penalties pursuant to 415 ILCS 5/42 and 44. This form has been approved by the Forms Management Center.

Certification: I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. Please print: Last Name TRUSZKOWSKI First Name APRIL B. Title Regulatory Affairs Manager

C. Signature April A. Truszkowski D. Date of Signature 2/26/99
Page 13 00001 of 9

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ILLINOIS Environmental Protection Agency
1998 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: LABPACK OF MISCELLANEOUS CHEMICALS
B. EPA Hazardous Waste Code: D 0 0 9 D 0 0 2 D 0 0 1
C. SIC code: 2 8 6 9
D. Origin Code: 1 System type: M 1 4 1 E. Source Code: A 5 8 A A
F. Point of Measurement: 1 G. Waste form code: B 0 0 3
H. Radioactive mixed: 2 I. TRI Constituent: 2
J. CAS numbers: 1. 76 2. 84 3. 92
4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density 117 (Same unit and density must be used for all quantities on this page).
Quantity generated in: B. Previous reporting year: 1 5 0 . 0
C. Current reporting year: 5 0 . 0
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)
On-Site System 1: System Type M Status 145 Quantity managed on-site this year: 147
On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162

SECTION 3. OFF- SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)
SITE 1. Name and address of facility: Safety-Kleen (Pecatonica), Inc.
6125 N. Pecatonica Rd., Pecatonica, IL 61063
B. U.S. EPA ID No. of facility waste was shipped to: 1 1 8 9 8 0 5 0 2 7 4 4
C. System type shipped to: M 1 4 1 D. Off-site availability code: 1
E. Total quantity shipped in this reporting year: 5 0 . 0
SITE 2. Name and address of facility:
B. U.S. EPA ID No. of facility waste was shipped to: 200
C. System type shipped to: M D. Off-site availability code: 216
E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5)
B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 246
D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)
E. Quantity recycled in reporting year due to new activities: 248
F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N
Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) N
Quantity stored at year end and for 90 days or more, generated this reporting year: 273
Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 2
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ILLINOIS Environmental Protection Agency
1998 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: ORGANIC FLAMMABLE WASTE FROM LABORATORIES
B. EPA Hazardous Waste Code: D 0 0 1 D 0 0 4 D 0 0 8 D 0 2 2 D 0 2 8
C. SIC code: 2 8 6 9
D. Origin Code: 1 System type: M 1 4 1 E. Source Code: A 9 4 A A
F. Point of Measurement: 1 G. Waste form code: B 2 0 4
H. Radioactive mixed: 2 I. TRI Constituent: 2
J. CAS numbers: 1. 76 2. 84 3. 92
4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 7.9 (Same unit and density must be used for all quantities on this page).
Quantity generated in: B. Previous reporting year: 7 7 0 . 0
C. Current reporting year: 7 7 0 . 0
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)
On-Site System 1: System Type M Status 145 Quantity managed on-site this year: 147
On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)
SITE 1. Name and address of facility: Safety-Kleen(Pecatonica), Inc.
6125 N. Pecatonica Rd., Pecatonica, IL 61063
B. U.S. EPA ID No. of facility waste was shipped to: I L D 9 8 0 5 0 2 7 4 4
C. System type shipped to: M 1 4 1 D. Off-site availability code: 1
E. Total quantity shipped in this reporting year: 7 7 0 . 0
SITE 2. Name and address of facility:
B. U.S. EPA ID No. of facility waste was shipped to: 200
C. System type shipped to: M D. Off-site availability code: 216
E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5)
B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 246
D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)
E. Quantity recycled in reporting year due to new activities: 248
F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N
Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) N
Quantity stored at year end and for 90 days or more, generated this reporting year: 273
Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 3
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Comments:

EPA Hazardous Waste Codes Cont.: D038, F002, F003, F005

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1998 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: ORGANIC FLAMMABLE WASTE FROM LABORATORIES

B. EPA Hazardous Waste Code: D 0 0 1 D 0 0 2 D 0 0 4 D 0 0 8 D 0 2 2

C. SIC code: 2 8 6 9

D. Origin Code: 1 System type: M 1 4 1 E. Source Code: A 9 4 A A

F. Point of Measurement: 1 G. Waste form code: B 2 0 4

H. Radioactive mixed: 2 I. TRI Constituent: 2

J. CAS numbers: 1. 76 2. 84 3. 92
4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 7.9 (Same unit and density must be used for all quantities on this page).

Quantity generated in: B. Previous reporting year: 0

C. Current reporting year: 5 5 . 0

D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)

On-Site System 1: System Type M Status 145 Quantity managed on-site this year: 147

On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Safety-Kleen (Pecatonica), Inc.
6125 N. Pecatonica Rd., Pecatonica, IL 61063

B. U.S. EPA ID No. of facility waste was shipped to: 1 7 3 9 8 0 5 0 2 7 4 4

C. System type shipped to: M 1 4 1 D. Off-site availability code: 1

E. Total quantity shipped in this reporting year: 5 5 . 0

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: 200

C. System type shipped to: M D. Off-site availability code: 215

E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? N Y = Yes (Cont to Box B) N = No (Cont to Section 5)

B. Activity: W W W W W W C. Other Effects? (Y = Yes, N = No) 246

D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)

E. Quantity recycled in reporting year due to new activities: 248

F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N

Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) N

Quantity stored at year end and for 90 days or more, generated this reporting year: 273

Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: Y Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 5

Comments:

EPA Hazardous Waste Codes Cont.: D028, D038, F002, F003, F005

CP HALL CO
5851 W 73RD ST
BEDFORD PARK

IL
60638

ILLINOIS Environmental Protection Agency
1998 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: FLAMMABLE METHANOL LIQUID BY-PRODUCT FROM MANUFACTURING
B. EPA Hazardous Waste Code: D 0 0 1
C. SIC code: 2 8 6 9
D. Origin Code: 1 System type: M E. Source Code: A 3 5 A A
F. Point of Measurement: 1 G. Waste form code: B 2 0 3
H. Radioactive mixed: 2 I. TRI Constituent: 3
J. CAS numbers: 1. 6 7 - 5 6 - 1 2. 3
4. 100 5. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 6.5 (Same unit and density must be used for all quantities on this page).
Quantity generated in: B. Previous reporting year: 2 0 0 5 6 1 . 0
C. Current reporting year: 1 6 0 3 4 9 . 0
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)
On-Site System 1: System Type M Status 145 Quantity managed on-site this year: 147
On-Site System 2: System Type M Status 161 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Lonestar Alternative Fuels
Limedale Rd.; P.O. Box 485, Greencastle, IN 46153

B. U.S. EPA ID No. of facility waste was shipped to: IND 0 0 6 4 1 0 2 1 2
C. System type shipped to: M 0 6 1 D. Off-site availability code: 1
E. Total quantity shipped in this reporting year: 4 5 3 9 .

SITE 2. Name and address of facility:

B. U.S. EPA ID No. of facility waste was shipped to: 200
C. System type shipped to: M D. Off-site availability code: 216
E. Total quantity shipped in this reporting year: 217

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? Y Y = Yes (Cont to Box B) N = No (Cont to Section 5)
B. Activity: W 4 2 W W W W W C. Other Effects? (Y = Yes, N = No) 246
D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)
E. Quantity recycled in reporting year due to new activities: 248
F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes; N=No) N
Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) N
Quantity stored at year end and for 90 days or more, generated this reporting year: 273
Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 7
293 13

CP HALL CO
5851 W 73RD ST
BEDFORD PARK

IL
60638

ILLINOIS Environmental Protection Agency
1998 Hazardous Waste Report
Form GM - Generation and Management

Instructions for this form found on pages 17-32.

SECTION 1. WASTE DESCRIPTION

A. Waste Description: FLAMMABLE METHANOL LIQUID BY-PRODUCT FROM MANUFACTURING
B. EPA Hazardous Waste Code: D 0 0 1
C. SIC code: 2 8 6 9
D. Origin Code: 1 System type: M E. Source Code: A 3 5
F. Point of Measurement: 1 G. Waste form code: B 2 0 3
H. Radioactive mixed: 2 I. TRI Constituent: 3
J. CAS numbers: 1. 6 7 - 5 6 - 1 2. 100 3. 108

SECTION 2. QUANTITY GENERATED

A. UOM: 1 Density: 6.5 (Same unit and density must be used for all quantities on this page).
Quantity generated in: B. Previous reporting year: 2 0 0 5 6 1 . 0
C. Current reporting year: 1 6 0 3 4 9 . 0
D. QUANTITY MANAGED ON-SITE: Did this location manage some or all of this waste in exempt or regulated treatment, recycling, or disposal units at this location? N Y = Yes (continue to system 1) N = No (skip to section 3)
On-Site System 1: System Type M Status 142 Quantity managed on-site this year: 147
On-Site System 2: System Type M Status 157 Quantity managed on-site this year: 162

SECTION 3. OFF-SITE SHIPMENT

A. Was any of this waste shipped off site this reporting year? Y Y = Yes (Continue to Site 1) N = No (Skip to Section 4)

SITE 1. Name and address of facility: Pollution Control Industries
4343 Kennedy Ave., East Chicago, IN 46312
B. U.S. EPA ID No. of facility waste was shipped to: I N D 0 0 0 6 4 6 9 4 3
C. System type shipped to: M 0 6 1 D. Off-site availability code: 1
E. Total quantity shipped in this reporting year: 1 4 4 5 6 5 . 0
SITE 2. Name and address of facility: Heritage Environmental Services, Inc.
15330 Canal Bank Rd., Lemont, IL 60439
B. U.S. EPA ID No. of facility waste was shipped to: I L D 0 8 5 3 4 9 2 6 4
C. System type shipped to: M 0 6 1 D. Off-site availability code: 1
E. Total quantity shipped in this reporting year: 1 1 2 4 5 . 0

SECTION 4. WASTE MINIMIZATION ACTIVITIES

A. Did you engage in any waste minimization activities for this reporting year? Y Y = Yes (Cont to Box B) N = No (Cont to Section 5)
B. Activity: W 4 2 W W W W W C. Other Effects? (Y = Yes, N = No) N
D. How many new waste minimization activities were implemented in this reporting year for this waste? 247 (Number)
E. Quantity recycled in reporting year due to new activities: 248
F. Activity/Production index: 258 G. Source Reduction quantity due to new activities: 261

SECTION 5. REGULATED STORAGE

A. Did this site store RCRA wastes 90 days or more and then ship it off-site (to site shown in Section 3)? (Y=Yes, N=No) N
Did this site store RCRA wastes on-site for more than 90 days but waste is in storage at year end: (y=Yes, N=No) N
Quantity stored at year end and for 90 days or more, generated this reporting year: 273
Quantity stored at year end that was generated prior to this reporting year: 283

COMMENTS: Enter Y (Yes) if you have comments regarding this page and attach extra sheet. Page 6
293 13

CP HALL CO
5851 W 73RD ST
BEDFORD PARK

IL
60638

ILLINOIS Environmental Protection Agency
1998 Hazardous Waste Report
Form TI - Transporter Identification

Instructions for this form found on page 33.

1. U.S. EPA ID No. I L D 9 8 4 7 7 5 0 4 9 Hauling Permit No. 1 0 7 0
31 127

Transporter Name and Address: Ozinga
21900 S. Central Avenue
Matteson, IL 60443

2. U.S. EPA ID No. I N D 0 5 8 4 8 4 1 1 4 Hauling Permit No. 1 5 5 4
43 139

Transporter Name and Address: Heritage Transport
1626 Research Way
Indianapolis, IN 46231

3. U.S. EPA ID No. I L D 0 6 2 3 3 3 7 5 2 Hauling Permit No. 1 2 4 1
55 151

Transporter Name and Address: Fort Transfer
225 Maple St.
Morton, IL 61550

4. U.S. EPA ID No. M O D 0 9 5 0 3 8 9 9 8 Hauling Permit No. 1 5 1 3
67 163

Transporter Name and Address: Tristate Motor Transit
P. O. Box 113
Joplin, MO 64802

5. U.S. EPA ID No. I N D 0 0 0 6 4 6 9 4 3 Hauling Permit No. U P W 0 4 4 6 2 7 6 - O H
79 175

Transporter Name and Address: Pollution Control Industries
4343 Kennedy Avenue
East Chicago, IN 46312

6. U.S. EPA ID No. I N D 0 0 0 6 4 0 8 4 7 Hauling Permit No. _____
91 187

Transporter Name and Address: R L Carter
8451 S. State Rd. 39
Clayton, IN 46118

7. U.S. EPA ID No. S C D 9 8 7 5 7 4 6 4 7 Hauling Permit No. _____
103 199

Transporter Name and Address: Safety-Kleen (Pecatonica), Inc.
6125 N. Pecatonica Rd.
Pecatonica, IL 61063

8. U.S. EPA ID No. _____ Hauling Permit No. _____
115 211

Transporter Name and Address:

COMMENTS: _____ Enter Y(Yes) if you have comments regarding this page; attach extra sheet. Page 9

Compliance Assistance Survey

SPECIAL WASTE DISPOSITION FORM

	WASTE NAME	GENERATING PROCESS	WASTE DETER. (HAZ / NONHAZ / UNK)	AMT. ON SITE (LBS / GAL)	METHOD OF HANDLING/ STORAGE	LABELED (Y / N)	ACCUM DATE (Y / N)	CONTAIN CLOSED (Y / N)
1	Paint waste	spray booths for parts	Haz D001	~ 25 gal	Drum	Y	Y	Y
2	Waste Corrosive	Park Migration Line	haz D002	0	Drum	N/A	N/A	N/A
3	Waste Coolant	Machinery Maint.	non-haz	0	Drum	N/A	N/A	N/A
4								
5								
6								
7								

	COND. OF CONTAIN. (GOOD / POOR)	GEN. RATE/MO. (LBS / GALS)	MANIFEST (Y / N / EXEMPT)	TRANSPORTER	RECEIVING FACILITY	RECYCLED (Y / N)	AMT. RECYCLED/ MO. (LBS / GAL)
1	Good	1 drum/mo.	Y	Fisher Industrial Service	Fisher Industrial Services	N	N/A
2	N/A	1 Drum/mo	Y	↓	Glencoe, AL	N	N/A
3	N/A	4 Drum/mo.	Y		↓	N	N/A
4							
5							
6							
7							



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276

THOMAS V. SKINNER, DIRECTOR

217/524-3300

May 24, 1999

Mr. Philip L. Comella
Seyfarth, Shaw, Fairweather & Geraldson
55 East Monroe Street, Suite 4200
Chicago, Illinois 60603-5803

Re: 0310125040 -- Cook County
The C.P. Hall Company
Log #PS99-031
State Permit File

RECEIVED
ENVIRONMENTAL PROTECTION AGENCY
MAY 20 1999
BUREAU OF LAND POLLUTION CONTROL
STATE OF ILLINOIS

Dear Mr. Comella:

This letter is in response to The C.P. Hall Company's February 17, 1999 request concerning the regulatory status of methanol produced during the manufacturing of esters and plasticizers. The methanol The C.P. Hall Company generates is a mixture of methanol, waste and other constituents. The company has modified its manufacturing process to allow for the separation of methanol into high purity and low purity grades. The high purity methanol contains 91-92% methanol, 4-5% water, and 3-4% organic constituents such as raw materials, intermediates, and finished product. The C.P. Hall Company proposes to market this high purity methanol as a substitute for the commercial grade methanol currently used by Peoples Gas to dehydrate natural gas pipelines. The C.P. Hall Company asked the Illinois Environmental Protection Agency ("Illinois EPA") for a written determination that the high purity methanol meets the definition of a co-product and therefore, exempt from the solid and hazardous waste regulations.

A by-product, pursuant to 35 Ill. Adm. Code 721.101(c)(3), is a material that is not one of the primary products of a production process and is not solely or separately produced by the production process. The preamble to the 1985 Definition of Solid Waste final rule describes by-products as, "materials, generally of a residual character, that are not produced intentionally or separately, and that are unfit for end use without substantial processing" (50 FR 625, January 4, 1985).

Distinct from a by-product, the preamble to the 1985 rule provides clarification as to what would be considered a co-product under RCRA. The preamble describes a co-product as, "materials produced intentionally, and which in their existing state are ordinarily used as commodities in trade by the general public" (50 FR 625, January 4, 1985).

Page 3

I hope this response has clarified the regulatory status of The C.P. Hall Company's high purity methanol. If you have any additional questions in this matter, please feel free to contact Trupti Dongre of my staff at 217/557-3200.

Sincerely,



Joyce L. Munie, P.E.
Manager, Permit Section
Bureau of Land

JLM:TD \mls\992256

bcc: Bureau File
Maywood Region
Ted Dragovich
Jackie Muchow
Paul Purseglove
Joyce Munie
Trupti Dongre



PLEASE PRINT OR TYPE

(Form designed for use on elite (12-pitch) typewriter.)

Form Approved: OMB No. 2050-0039. Expires 9-30-2000

UNIFORM HAZARDOUS
WASTE MANIFEST

1. Generator's U.S. EPA ID Number

Manifest
Document No.

2. Page 1
of 1

Information in the shaded areas is not
required by Federal Law, but items D, F,
H, I and K are required by State Law.

3. Generator's Name and Mailing Address

CE HALL COMPANY
13RD STREET
LESTER PARK, IL 604990910

A. State Manifest Document Number

INA 1510623

B. State Generator's ID

0310125037

4. Generator's Telephone Number (708 594-5977

EMERGENCY CONTACT: BOX 15

5. Transporter 1 Company Name

6. U.S. EPA ID Number

11.L.D 18.47.7.5.0.4.9

C. State Transporter's ID

0310125037

D. Transporter's Phone

7. Transporter 2 Company Name

8. U.S. EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address

WASTE CONTROL INDUSTRIES
400 E. MADISON AVENUE
CHICAGO, IN 46312

10. U.S. EPA ID Number

I.N.D. 0-0-0-6-4-6-9-4-3

G. State Facility's ID

0180550026

H. Facility's Phone

312-327-3951

11. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers
No. Type

13. Total
Quantity

14. Unit
Wt/Vol.

Waste No.

a. WASTE METHYL ALCOHOL SOLUTION
N1230, PG II, (RQ-100), (EPA D001), (ERG 131)

001 T.T. 04436 g

b.

...

c.

...

d.

...

J. Additional Descriptions for Materials Listed Above

11A. 500767L WASTE METHANOL

K. Handling Codes for Wastes Listed Above

...

15. Special Handling Instructions and Additional Information

WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING.

EMERGENCY CONTACT:

CE HALL COMPANY

708-594-5999

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed Typed Name

Signature

Date
Month Day Year
7.15.99

17. Transporter 1 - Acknowledgement of Receipt of Materials

Printed Typed Name

Signature

Date
Month Day Year
7.15.99

18. Transporter 2 - Acknowledgement of Receipt of Materials

Printed Typed Name

Signature

Date
Month Day Year
...

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest (except as noted in Item 19).

Printed Typed Name

Signature

Date
Month Day Year
7.15.99

INA1510623

In case of a spill, call the Indiana Office of Environmental Response at 317/445-1149 (day or night) or the National Response Center at 800/424-9302 or 202/426-2675.

Gino agreed that C.P. Hall is probably a large quantity generator, in light of the quantity of material manifested off site as hazardous waste.

Upon receipt of the response from C.P. Hall to the S3007 request, RCRIS should be corrected, and the ILT ID number verified as correct.

cc: Jane Ratcliffe, PMB, IMS, DR-7J

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

DATE: 30 August 1999

SUBJECT: RCRA Records Confusion, C.P. Hall Inc, Bedford Park, IL
ILT 180 010 340
ILD 004 163 283

FROM: John Gaitskill, Environmental Engineer
Illinois/Indiana Section
Enforcement and Compliance Assurance Branch

TO: Lorna Jereza, Chief, IL/IN Section, ECAB

RECEIVED
MAR 24 2000
RCRA RECORDS ROOM
Waste, Pesticides & Toxics Division
U.S. EPA—REGION 5

While researching in preparation for the RCRA inspection of C.P. Hall, I discovered some conflicting information. In the WPTD records center, the documents for the above ID numbers were filed as non-regulated, using an ID number indicating it is temporary. A check of October 1998 RCRIS records indicated the facilities to be shutdown, however, in July 1999, RCRIS was changed to indicate the facilities to be very small quantity generators. There is no correspondence in the file since 1995. A letter of September 1995 from C.P. Hall to Sharon Kiddon, USEPA, says the company was notified it had been deactivated, but informing USEPA it is an active generator.

The inspection indicated the C.P. Hall's plant at 5851 West 73rd Street, Bedford Park, IL to have 2 tanks that store material generated by the manufacturing process. The company claims it is a by product, but it has been routinely shipped offsite at approximately 2 week intervals using hazardous waste manifests. None has been sold as by product during 1999. C.P. Hall said it sold some in 1998, but could not provide documentation during the inspection. A \$3007 information request is being prepared to have C.P. Hall verify its RCRA status.

The inspection acknowledgment letter to the company will include a RCRA \$3007 request for additional information not available during the inspection. Also the ID numbers for C.P. Hall need to be verified as correct. I understand an "ILT" ID number should not be permanently assigned as a RCRA ID number. RCRIS should indicate the facility at 5851 West 73rd Street, Bedford Park, IL to be a large quantity generator. It presently has the ID ILT 180 010 340. The building at 7300 South Central Avenue, Bedford, IL appears to be a very small quantity generator. The response to the 3007 request should verify the generator status of C.P. Hall facilities. 14D004163283

I had a conversation with Gino Bruni of IEPA prior to my inspection, who indicated there had been an inspection by IEPA in 1983. The inspector apparently told C.P. Hall it was not regulated under Illinois RCRA regs. I described the activities I observed during my inspection of 16 August 1999 and

PLEASE TYPE

(Form designed for use on

2 pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-8

Form Approved OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

IL T 1 8 0 0 1 0 3 4 0

Man. Document 199.

2. Page 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

3. Generator's Name and Mailing Address

CP HALL COMPANY

7400 S. CENTRAL AVENUE
CHICAGO, IL 60606

5851 W 73rd STREET

BEDFORD PARK, IL 60499

Location If Different

4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS

SEE BOX 15

5. Transporter 1 Company Name

VOPAK USA INC.

6. US EPA ID Number

IL R 0 0 0 0 3 4 3 8 9

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

POLLUTION CONTROL INDUSTRIES
4343 KENNEDY AVENUE
EAST CHICAGO, IN 46312

10. US EPA ID Number

IN D 0 0 0 6 4 6 9 4 3

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

a. RQ, WASTE FLAMMABLE LIQUIDS, W.O.S.

(ACETONE, BUTANOL)

3, UN1993, PG II, (RQ=100), (EPA D001 F003 F005 D022), (ERG 128)

12. Containers
No. Type

0.02 D.M.

13. Total
Quantity

001.10 G

14. Unit
Wt/Vol

G

1. Waste No.

EPA HW Number
D 0 0 1

EPA HW Number

EPA HW Number

EPA HW Number

J. Additional Description for Materials Listed Above

11a. 00060596LF LABORATORY SOLVENT WASTE
ADDITIONAL WASTE CODES F003 F005 D022

K. Handling Codes for Wastes Listed Above
In Item #14

G = GALLONS

S01

15. Special Handling Instructions and Additional Information

WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING.
EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY VOPAK USA AS SHIPPER.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

DRUANN JENNINGS

Signature

On Behalf of CP Hall
Druann Jennings

Date

Month Day Year

07/20/

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

DONALD WASOWICZ

Signature

Donald Wasowicz

Date

Month Day Year

07/20/

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

SUSAN SMURDON

Signature

Susan Smurdon

Date

Month Day Year

07/19/01

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

TRANSPORTATION / HANDLING AGREEMENT

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location CP HALL COMPANY 5851 W 73RD STREET BEDFORD PARK IL 60499

A ID Number ILT180010340 Manifest Number IL8829996

Site Analysis Available Yes X No On file at facility Date 7/12/01

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
a	b	c	d	Nonwastewater > 1% TOC & > 1% TSS e	Wastewater f	List all applicable constituents from key below g	List all applicable constituents from Table I and/or key below h
060596LF		D001 F003 F005 D022	X	1			5 19 22 32 35 75 162 169 229

CALIFORNIA LIST WASTES (for Column g)

1) CB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (TI) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|-----------------------------|-----------------------------------|----------------------------|---|
| Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature [Signature] Print Name DRUANN JENNINGS
on Behalf of CP Hall

GENERATOR CERTIFICATION

Impermissible Dilution By Combustion and Fuel Blending Certification:

To the best of my knowledge and based on the information provided to me by those responsible for gathering such information, the waste(s) covered by this notification do not contain inorganic metal-bearing wastes which have undergone impermissible dilution as specified in the May 23, 1994 RCRA Policy Statement: "Clarification of the Land Disposal Restriction Dilution Prohibition and Combustion of Inorganic Metal-Bearing Hazardous Waste".

Transport Container Condition Certification:

I certify that the transport container used to ship this load was inspected by authorized representative of the generator prior to shipment for structural integrity, secure openings, and significant external evidence of spills. I further certify that all internal valves (if any) of this transport vehicle were inspected by authorized representatives of the generator and found to be operational, and properly seated and closed prior to loading the vehicle.

F020/F039 Dioxin/Furan and Polychlorinated Biphenyl Certification:

I, certify under penalty of law that the waste material submitted for acceptance to Pollution Control Industries of Indiana, Inc. does not contain the following:

- F020 through F023, F026, F027, F028, F032 or the F039 Dioxin, Dioxin related compounds or Furan as defined under 40CFR 261.
- Polychlorinated Biphenyl (PCB) at concentrations >30ppm and was not derived from a source greater than 50ppm as defined in 40CFR 761.

I certify under penalty of law that my signature represents my certification of the information mentioned above.

Dennis Jennings Ship Coord.
Signature Title

7/12/01
Date

on Behalf of C. P. Hall

TABLE I - UNIVERSAL TREATMENT STANDARDS
REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F039 (for Column h)

#	Constituent	#	Constituent	#	Constituent
33)	Acenaphthylene	105)	1,2-Dichloroethane	178)	5-Nitro-o-toluidine
34)	Acenaphthene	106)	1,1-Dichloroethylene	179)	o-Nitrophenol
35)	Acetone	107)	trans-1,2-Dichloroethylene	180)	p-Nitrophenol
36)	Acetonitrile	108)	2,4-Dichlorophenol	181)	N-Nitrosodiethylamine
37)	Acetophenone	109)	2,6-Dichlorophenol	182)	N-Nitrosodimethylamine
38)	2-Acetylaminofluorene	110)	1,2-Dichloropropane	183)	N-Nitroso-di-n-butylamine
39)	Acrolein	111)	cis-1,3-Dichloropropylene	184)	N-Nitrosomethylethylamine
40)	Acrylamide	112)	trans-Dichloropropylene	185)	N-Nitrosomorpholine
41)	Acrylonitrile	113)	Dieldrin	186)	N-Nitrosopiperidine
42)	Aldrin	114)	Diethyl phthalate	187)	N-Nitrosopyrrolidine
43)	4-Aminobiphenyl	115)	2,4-Dimethyl phenol	188)	Parathion
44)	Aniline	116)	Dimethyl Phthalate	189)	Total PCBs (sum of all PCB isomers, or all Aroclors)
45)	Anthracene	117)	Di-n-butyl phthalate	190)	Pentachlorobenzene
46)	Aramid	118)	1,4-Dinitrobenzene	191)	PeCDDs (All Pentachlorodibenzo-p-dioxins)
47)	alpha-BHC	119)	4,6-Dinitro-o-cresol	192)	PeCDFs (All Pentachlorodibenzofurans)
48)	beta-BHC	120)	2,4-Dinitrophenol	193)	Pentachloroethane
49)	delta-BHC	121)	2,4-Dinitrotoluene	194)	Pentachloronitrobenzene
50)	gamma-BHC	122)	2,6-Dinitrotoluene	195)	Pentachlorophenol
51)	Benzene	123)	Di-n-octyl phthalate	196)	Phenacetin
52)	Benz(a)anthracene	124)	p-Dimethylaminosazobenzene	197)	Phenanthrene
53)	Benzyl chloride	125)	Di-n-propylnitrosamine	198)	Phenol
54)	Benzobifluoranthene (difficult to distinguish from benzo(k)fluoranthene)	126)	1,4-Dioxane	199)	Phorate
55)	Benzo(k)fluoranthene (difficult to distinguish from benzo(b)fluoranthene)	127)	Diphenylamine (difficult to distinguish from diphenylnitrosamine)	200)	Phthalic acid
56)	Benzo(g,h,i)perylene	128)	Diphenylnitrosamine (difficult to distinguish from diphenylamine)	201)	Phthalic anhydride
57)	Benzo(a)pyrene	129)	1,2-Diphenylhydrazine	202)	Promamide
58)	Bromodichloromethane	130)	Disulfoton	203)	Pyrene
59)	Methyl bromide (Bromomethane)	131)	Endosulfan I	204)	Pyridine
60)	4-Bromophenyl phenyl ether	132)	Endosulfan II	205)	Saflor
61)	n-Butyl alcohol	133)	Endosulfan sulfate	206)	Silvex (2,4,5-TP)
62)	Butyl benzyl phthalate	134)	Endrin	207)	2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)
63)	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)	135)	Endrin aldehyde	208)	1,2,4,5-Tetrachlorobenzene
64)	Carbon disulfide	136)	Ethyl acetate	209)	TCDDs (All Tetrachlorodibenzo-p-dioxins)
65)	Carbon tetrachloride	137)	Ethyl cyanide (Propanenitrile)	210)	TCDFs (All Tetrachlorodibenzofurans)
66)	Chlordane (alpha and gamma isomers)	138)	Ethyl benzene	211)	1,1,1,2-Tetrachloroethane
67)	p-Chloroaniline	139)	Ethyl ether	212)	1,1,2,2-Tetrachloroethane
68)	Chlorobenzene	140)	bis(2-Ethylhexyl) phthalate	213)	Tetrachloroethylene
69)	Chlorobenzoate	141)	Ethyl methacrylate	214)	2,3,4,6-Tetrachlorophenol
70)	2-Chloro-1,3-butadiene	142)	Ethylene oxide	215)	Toluene
71)	Chlorodibromomethane	143)	Famphur	216)	Toxaphene
72)	Chloroethane	144)	Fluoranthene	217)	Bromoform (Tribromomethane)
73)	bis(2-Chloroethoxy)methane	145)	Fluorene	218)	1,2,4-Trichlorobenzene
74)	bis(2-Chloroethyl)ether	146)	Heptachlor	219)	1,1,1-Trichloroethane
75)	Chloroform	147)	Heptachlor epoxide	220)	1,1,2-Trichloroethane
76)	bis(2-Chloroisopropyl)ether	148)	Hexachlorobenzene	221)	Trichloroethylene
77)	p-Chloro-m-cresol	149)	Hexachlorobutadiene	222)	Trichloromonofluoromethane
78)	2-Chloroethyl vinyl ether	150)	Hexachlorocyclopentadiene	223)	2,4,5-Trichlorophenol
79)	Chloromethane (Methyl chloride)	151)	HxCDDs (All Hexachlorodibenzo-p-dioxins)	224)	2,4,6-Trichlorophenol
80)	2-Chloronaphthalene	152)	HxCDFs (All Hexachlorodibenzofurans)	225)	1,2,3-Trichloropropane
81)	2-Chlorophenol	153)	Hexachloroethane	226)	1,1,2-Trichloro-1,2,2-trifluoroethane
82)	3-Chloropropylene	154)	Hexachloropropylene	227)	tris-(2,3-Dibromopropyl) phosphate
83)	Chrysene	155)	Indeno (1,2,3-c,d) pyrene	228)	Vinyl chloride
84)	o-Cresol	156)	Iodomethane	229)	Xylenes-mixed isomers (sum of o-, m-, and p-xylene concentrations)
85)	m-Cresol (difficult to distinguish from p-cresol)	157)	Isobutyl alcohol	230)	Antimony
86)	p-Cresol (difficult to distinguish from m-cresol)	158)	Isodrin	231)	Arsenic
87)	Cyclohexanone	159)	Isosafrole	232)	Barium
88)	1,2-Dibromo-3-chloropropane	160)	Kepon	233)	Beryllium
89)	Ethylene dibromide (1,2-Dibromoethane)	161)	Methacrylonitrile	234)	Cadmium
90)	Dibromomethane	162)	Methanol	235)	Chromium (Total)
91)	2,4-D (2,4-Dichlorophenoxyacetic acid)	163)	Methapyrilene	236)	Cyanides (Total)
92)	o,p-DCD	164)	Methoxychlor	237)	Cyanides (Amenable)
93)	p,p-DCD	165)	3-Methycholanthrene	238)	Fluoride
94)	o,p-DCE	166)	4,4-Methylene bis(2-chloroaniline)	239)	Lead
95)	p,p-DCE	167)	Methylene chloride	240)	Mercury—Nonwastewater from Reton
96)	o,p-DDT	168)	Methyl ethyl ketone	241)	Mercury—All Others
97)	p,p-DDT	169)	Methyl isobutyl ketone	242)	Nickel
98)	p,p-DDT	170)	Methyl methacrylate	243)	Selenium
99)	Dibenz(a,h)anthracene	171)	Methyl methanesulfonate	244)	Silver
100)	m-Dichlorobenzene	172)	Methyl parathion	245)	Sulfide
101)	o-Dichlorobenzene	173)	Naphthalene	246)	Thallium
102)	p-Dichlorobenzene	174)	2-Naphthylamine	247)	Vanadium
103)	Dichlorodifluoromethane	175)	o-Nitroaniline	248)	Zinc
104)	1,1-Dichloroethane	176)	p-Nitroaniline	249)	none apply
		177)	Nitrobenzene		

TABLE II

The following waste codes have subcategories and the appropriate key number must be selected and placed in Column d on FORM #1.

WASTE CODES	KEY NUMBER	SUBCATEGORY
D001	1	High TOC ignitable liquids.
	2	Low TOC ignitable liquids managed in CWA/CWA-equivalent/Class I SDWA systems.
	3	Low TOC ignitable liquids managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.
D002	4	Corrosive waste managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.
	5	Corrosive waste managed in CWA/CWA equivalent/Class I SDWA systems.
D003	6	Reactive Sulfides
	7	Other Reactives
	8	Water Reactive
	9	Reactive Cyanide
D006	10	Characteristic for Cd based on extraction procedure.
	11	Cadmium containing batteries.
D008	12	Characteristic for Pb based on extraction procedure.
	13	Lead Acid Batteries.
D009	14	Low Mercury. (< 260 ppm total Hg)
	15	All D009 wastewaters.
F003 F005	16	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexanone, and/or methanol.
F005	17	Contains only 2-Nitropropane.
	18	Contains only 2-Ethoxyethanol.
F025	19	Light Ends.
	20	Spent Filters/Aids and Desiccants.
K006	21	Anhydrous.
	22	Hydrated.
U151	23	Nonwastewaters that contain >260mg/kg total mercury
	24	All U151 (mercury) wastewaters
K071	25	Nonwastewaters that are residues from RMERC
	26	Nonwastewaters that are not residues from RMERC
	27	All K071 Wastewaters
P047	28	4,6-Dinitro-o-cresol.
	29	4,6-Dinitro-o-cresol salts.
P065	30	Nonwastewaters, not incinerator or RMERC residues.
	31	Nonwastewaters from RMERC w/ less than 260 ppm Hg.
	32	Nonwastewaters from incinerator residues w/ less than 260 ppm Hg.
	33	All P065 wastewaters.
	34	Nonwastewaters, not incinerator or RMERC residues.
	35	Nonwastewaters from RMERC w/ less than 260 ppm Hg.
	36	Nonwastewaters from incinerator residues w/ less than 260 ppm Hg.
	37	All P092 wastewaters.
U040	38	2,4-D (2,4-Dichlorophenoxyacetic acid).



CERTIFICATE

This certificate is to verify that the waste specified is handled in accordance with all local, state and federal regulations as follows:

Manifest: IL8829995
Generator: CP HALL COMPANY

Section -----	Waste Stream -----	Handling Type -----
A	00060596	Recycled and/or Reclaimed

Facility Name: Pollution Control Industries
Facility Address: 4343 Kennedy Avenue
East Chicago, IN 46312
Facility EPA ID: IND000646943

Signature: 
Typed Name: Thomas R. McGillis

Title: Materials Manager
Date: 7/27/01

I-10018067

Pollution Control Industries
4343 Kennedy Avenue, East Chicago, IN 46312
(219) 397-3951 FAX: (219) 397-6411
www.pollutioncontrol.com



**RESPONSIBLESM
RECYCLING**
(committed to our generators,
our employees, and our community)

RELEASE TYPE

(Form designed for use on

(12 pitch) typewriter.)

EPA Form 8700-22 (Rev. 6-80)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.

M... ..
Document No.

2. Page 1

Information in the shaded areas is not required by Federal law, but is required by Illinois law.

I L T 1 R 0 0 1 0 3 4 0 2 9 7 2 5

3. Generator's Name and Mailing Address

Location If Different

CP HALL COMPANY
5851 W 73RD STREET
BEDFORD PARK, IL 604990910

A. Illinois Manifest Document Number

IL 8829725

FEE PAID
IF APPLICABLEB. Generator's IL
ID Number

10 13 11 10 11 12 15 10 13 17

C. Transporter's
ID Number

11PWN002R6330H

D. Transporter's Phone 708 728-6740

E. Transporter's
ID Number

F. Transporter's Phone ()

G. Facility's IL
ID Number

1911810181910101216

H. Facility's Phone 219 397-3951

4. *24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS*

SEE BOX 15

5. Transporter 1 Company Name

6. US EPA ID Number

VAN WATERS & ROGERS INC.

I L R 0 0 0 0 3 4 3 8 9

7. Transporter 2 Company Name

8. US EPA ID Number

9. Designated Facility Name and Site Address

10. US EPA ID Number

POLLUTION CONTROL INDUSTRIES
4343 KENNEDY AVENUE
EAST CHICAGO, IN 46312

I N D 0 0 0 6 4 6 9 4 3

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)

12. Containers

No.

Type

13. Total
Quantity14. Unit
Wt/Vol

1. Waste No.

a. WASTE FLAMMABLE SOLIDS, ORGANIC, N.O.S.
(AROMATIC HYDROCARBON, POLYESTER PLASTICIZER)
4.1, UN1325, PG II, (EPA D001), (ERG 133)

0.0.1

D-M

00450

P

EPA HW Number

D 0 0 1

b.

EPA HW Number

c.

EPA HW Number

d.

EPA HW Number

J. Additional Description for Materials Listed Above

11a. 01020669NF

FILTERS W/SOLVENTS

K. Handling Codes for Wastes Listed Above
In Item #14

P = POUNDS

S01

15. Special Handling Instructions and Additional Information

WEAR APPROPRIATE PROTECTIVE GEAR WHEN HANDLING.
EMERGENCY CONTACT: CHEMTREC: 1-800-424-9300. CALLER MUST IDENTIFY VAN WATERS &
ROGERS AS SHIPPER.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name

Signature

Date

ANTHONY E FERNAND

Anthony E Fernand

Month Day Year
032301

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

DONALD WASOWICZ

Donald Wasowicz

Month Day Year
032301

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date

Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in item 19.

Printed/Typed Name

Signature

Date

Coarner

Coarner

Month Day Year
032901

This Agency is authorized to require, pursuant to Illinois Revised Statute, 1989, Chapter 111 1/2, Section 1004 and 1021, that this information be submitted to the Agency. Failure to provide this information may result in a civil penalty against the owner or operator not to exceed \$25,000 per day of violation. Falsification of this information may result in a fine up to \$50,000 per day of violation and imprisonment up to 5 years. This form has been approved by the Forms Management Center.

COPY 1. TSD MAIL TO GENERATOR

In case of a spill call the Illinois Office of Emergency Response at 217 / 782-7860 and the National Response Center at 800 / 424-8802 or 202 / 426-2675.

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

Generator Name/Location CP HALL COMPANY

5851 WEST 73rd

BEDFORD PARK IL 60499

EPA ID Number ILT100010160

Manifest Number 110029725

Waste Analyte Available

Yes

No

Unk

On file at facility

Date 01/21/01

PROFILE #	RCRA NON-REGULATED Please check if waste stream is not regulated by RCRA.	RCRA WASTE CODES (List all that apply)	SUBCATEGORY (See Table II and Select Key # if applicable).	TREATABILITY GROUP Please check the applicable treatability group.		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F001-F005 & F039
				Nonwastewater > 1% TOC & > 1% TSS e	Wastewater f		
a	b	c	d			List all applicable constituents from key below g	List all applicable constituents from Table I and/or key h
01020669NF		D001		X			

CALIFORNIA LIST WASTES (for Column g)

- 1) PCB > = 50 ppm 2) Halogenated Organic Carbon (HOC's) > = 1000 mg/l 3) Nickel (Ni) > = 134 mg/l 4) Thallium (Tl) > = 130 mg/l

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|-----------------------------------|----------------------------|---|
| 5) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 6) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 7) N-Butyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 8) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 9) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 10) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 11) Cresols (o,m, or p isomers) | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I certify under penalty of law that the above information is accurate and true.

Signature *Anthony C. Fernandez*

Print Name ANTHONY C FERNANDEZ

GENERATOR CERTIFICATION

Impermissible Dilution By Combustion and Fuel Blending Certification:

To the best of my knowledge and based on the information provided to me by those responsible for gathering such information, the waste(s) covered by this notification do not contain inorganic metal-bearing wastes which have undergone impermissible dilution as specified in the May 23, 1994 RCRA Policy Statement: "Clarification of the Land Disposal Restriction Dilution Prohibition and Combustion of Inorganic Metal-Bearing Hazardous Waste".

Transport Container Condition Certification:

I certify that the transport container used to ship this load was inspected by authorized representative of the generator prior to shipment for structural integrity, secure openings, and significant external evidence of spills. I further certify that all internal valves (if any) of this transport vehicle were inspected by authorized representatives of the generator and found to be operational, and properly seated and closed prior to loading the vehicle.

F022/F039 Dioxin/Furan and Polychlorinated Biphenyl Certification:

I, certify under penalty of law that the waste material submitted for acceptance to Pollution Control Industries of Indiana, Inc. does not contain the following:

- F020 through F023, F026, F027, F028, F032 or the F039 Dioxin, Dioxin related compounds of Furan as defined under 40CFR 261.
- Polychlorinated Biphenyl (PCB) at concentrations >30ppm and was not derived from a source greater than 50ppm as defined in 40CFR 761.

I certify under penalty of law that my signature represents my certification of the information mentioned above.

Signature

Title

Date

W. H. S. E. M. S. R.

3/23/01

TABLE I - UNIVERSAL TREATMENT STANDARDS
REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, F039 (for Column h)

Constituent	#	Constituent	#	Constituent
33) Acenaphthylene	105)	1,2-Dichloroethane	178)	5-Nitro-o-toluidine
34) Acenaphthene	106)	1,1-Dichloroethylene	179)	o-Nitrophenol
35) Acetone	107)	trans-1,2-Dichloroethylene	180)	p-Nitrophenol
36) Acetonitrile	108)	2,4-Dichlorophenol	181)	N-Nitrosodiethylamine
37) Acetophenone	109)	2,6-Dichlorophenol	182)	N-Nitrosodimethylamine
38) 2-Acetylaminofluorene	110)	1,2-Dichloropropane	183)	N-Nitroso-di-n-butylamine
39) Actoin	111)	cis-1,3-Dichloropropylene	184)	N-Nitrosomethylethylamine
40) Acrylamide	112)	trans-Dichloropropylene	185)	N-Nitrosomorpholine
41) Acrylonitrile	113)	Dieldrin	186)	N-Nitrosopiperidine
42) Aldrin	114)	Diethyl phthalate	187)	N-Nitrosopyrrolidine
43) 4-Aminobiphenyl	115)	2,4-Dimethyl phenol	188)	Parathion
44) Aniline	116)	Dimethyl Phthalate	189)	Total PCBs (sum of all PCB isomers, or all Aroclors)
45) Anthracene	117)	Di-n-butyl phthalate	190)	Pentachlorobenzene
46) Aramine	118)	1,4-Dinitrobenzene	191)	PeCDDs (All Pentachlorodibenzo-p-dioxins)
47) alpha-BHC	119)	4,6-Dinitro-o-cresol	192)	PeCDFs (All Pentachlorodibenzofurans)
48) beta-BHC	120)	2,4-Dinitrophenol	193)	Pentachloroethane
49) delta-BHC	121)	2,4-Dinitrotoluene	194)	Pentachloronitrobenzene
50) gamma-BHC	122)	2,6-Dinitrotoluene	195)	Pentachlorophenol
51) Benzene	123)	Di-n-octyl phthalate	196)	Phenacetin
52) Benzanthracene	124)	p-Dimethylaminoazobenzene	197)	Phenanthrene
53) Benzyl chloride	125)	Di-n-propylnitrosamine	198)	Phenol
54) Benzobifluoranthene (difficult to distinguish from benzokifluoranthene)	126)	1,4-Dioxane	199)	Phorate
55) Benzokifluoranthene (difficult to distinguish from benzobifluoranthene)	127)	Diphenylamine (difficult to distinguish from diphenylnitrosamine)	200)	Phthalic acid
56) Benzogluiperylene	128)	Diphenylnitrosamine (difficult to distinguish from diphenylamine)	201)	Phthalic anhydride
57) Benzolaprene	129)	1,2-Diphenylhydrazine	202)	Pronamide
58) Bromodichloromethane	130)	Disulfoton	203)	Pyrene
59) Methyl bromide (Bromomethane)	131)	Endosulfan I	204)	Pyridine
60) 4-Bromophenyl phenyl ether	132)	Endosulfan II	205)	Safrole
61) n-Butyl alcohol	133)	Endosulfan sulfate	206)	Silvex (2,4,5-TP)
62) Butyl benzyl phthalate	134)	Endrin	207)	2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)
63) 1 sec Butyl-4,6-dinitrophenol (Dinoseb)	135)	Endrin aldehyde	208)	1,2,4,5-Tetrachlorobenzene
64) Carbon disulfide	136)	Ethyl acetate	209)	TCDDs (All Tetrachlorodibenzo-p-dioxins)
65) Carbon tetrachloride	137)	Ethyl cyanide (Propanenitrile)	210)	TCDFs (All Tetrachlorodibenzofurans)
66) Chlordane (alpha and gamma isomers)	138)	Ethyl benzene	211)	1,1,1,2-Tetrachloroethane
67) p-Chloroaniline	139)	Ethyl ether	212)	1,1,2,2-Tetrachloroethane
68) Chlorobenzene	140)	bis(2-Ethylhexyl) phthalate	213)	Tetrachloroethylene
69) Chlorobenzilate	141)	Ethyl methacrylate	214)	2,3,4,6-Tetrachlorophenol
70) 1-Chloro-1,3-butadiene	142)	Ethylene oxide	215)	Toluene
71) Chlorodibromomethane	143)	Famphur	216)	Toxaphene
72) Chloroethane	144)	Fluoranthene	217)	Bromoform (Tribromomethane)
73) bis(2-Chloroethoxy)methane	145)	Fluorene	218)	1,2,4-Trichlorobenzene
74) bis(2-Chloroethyl)ether	146)	Heptachlor	219)	1,1,1-Trichloroethane
75) Chloroform	147)	Heptachlor epoxide	220)	1,1,2-Trichloroethane
76) bis(2-Chloroisopropyl)ether	148)	Hexachlorobenzene	221)	Trichloroethylene
77) p-Chloro-m-cresol	149)	Hexachlorobutadiene	222)	Trichloromono-fluoromethane
78) 2-Chloroethyl vinyl ether	150)	Hexachlorocyclopentadiene	223)	2,4,5-Trichlorophenol
79) Chloromethane (Methyl chloride)	151)	HxCDDs (All Hexachlorodibenzo-p-dioxins)	224)	2,4,6-Trichlorophenol
80) 1-Chloronaphthalene	152)	HxCDFs (All Hexachlorodibenzofurans)	225)	1,2,3-Trichloropropane
81) 1-Chlorophenol	153)	Hexachloroethane	226)	1,1,2-Trichloro-1,2,2-trifluoroethane
82) 1-Chloropropylene	154)	Hexachloropropylene	227)	tris-(2,3-Dibromopropyl) phosphate
83) Chrysene	155)	Indeno (1,2,3-c,d) pyrene	228)	Vinyl chloride
84) o-Cresol	156)	Iodomethane	229)	Xylenes-mixed isomers (sum of o-, m-, and p-xylene concentrations)
85) m-Cresol (difficult to distinguish from p-cresol)	157)	Isobutyl alcohol	230)	Anumony
86) p-Cresol (difficult to distinguish from m-cresol)	158)	Isodrin	231)	Arsenic
87) Cyclohexanone	159)	Isosafrole	232)	Barium
88) 1,2-Dibromo-1-chloropropane	160)	Kepon	233)	Beryllium
89) Ethylene dibromide (1,2-Dibromoethane)	161)	Methacrylonitrile	234)	Cadmium
90) Dibromomethane	162)	Methanol	235)	Chromium (Total)
91) 2,4-D, 2,4-Dichlorophenoxyacetic acid	163)	Methapyrene	236)	Cyanides (Total)
92) o,p-DDD	164)	Methoxychlor	237)	Cyanides (Amenable)
93) p,p-DDD	165)	3-Methychloranthrene	238)	Fluoride
94) o,p-DDE	166)	4,4-Methylene bis(2-chloroaniline)	239)	Lead
95) p,p-DDE	167)	Methylene chloride	240)	Mercury-Nonwastewater from Reion
96) o,p-DDT	168)	Methyl ethyl ketone	241)	Mercury-All Others
97) p,p-DDT	169)	Methyl isobutyl ketone	242)	Nickel
100) m-Dichlorobenzene	170)	Methyl methacrylate	243)	Selenium
101) o-Dichlorobenzene	171)	Methyl methansulfonate	244)	Silver
102) p-Dichlorobenzene	172)	Methyl parathion	245)	Sulfide
103) Dichlorodifluoromethane	173)	Naphthalene	246)	Thallium
104) 1,2-Dichloroethane	174)	2-Naphthylamine	247)	Vanadium
	175)	o-Nitroaniline	248)	Zinc
	176)	p-Nitroaniline	249)	none apply
	177)	Nitrobenzene		

TABLE II

The following waste codes have subcategories and the appropriate key number must be selected and placed Column d on FORM #1.

WASTE CODES	KEY NUMBER	SUBCATEGORY
D001	1	High TOC ignitable liquids.
	2	Low TOC ignitable liquids managed in CWA/CWA-equivalent/Class I SDWA systems.
	3	Low TOC ignitable liquids managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.
D002	4	Corrosive waste managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.
	5	Corrosive waste managed in CWA/CWA equivalent/Class I SDWA systems.
D003	6	Reactive Sulfides
	7	Other Reactives
	8	Water Reactive
	9	Reactive Cyanide
D006	10	Characteristic for Cd based on extraction procedure.
	11	Cadmium containing batteries.
D008	12	Characteristic for Pb based on extraction procedure.
	13	Lead Acid Batteries.
D009	14	Low Mercury. (< 260 ppm total Hg)
	15	All D009 wastewaters.
F003 F005	16	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexanone, and/or methanol.
F005	17	Contains only 2-Nitropropane.
	18	Contains only 2-Ethoxyethanol.
F025	19	Light Ends.
	20	Spent Filters/Aids and Desiccants.
K006	21	Anhydrous.
	22	Hydrated.
U151	23	Nonwastewaters that contain >260mg/kg total mercury
	24	All U151 (mercury) wastewaters
K071	25	Nonwastewaters that are residues from RMERC
	26	Nonwastewaters that are not residues from RMERC
	27	All K071 Wastewaters
P047	28	4,6-Dinitro-o-cresol.
	29	4,6-Dinitro-o-cresol salts.
P065	30	Nonwastewaters, not incinerator or RMERC residues.
	31	Nonwastewaters from RMERC w/ less than 260 ppm Hg.
	32	Nonwastewaters from incinerator residues w/ less than 260 ppm Hg.
	33	All P065 wastewaters.
P092	34	Nonwastewaters, not incinerator or RMERC residues.
	35	Nonwastewaters from RMERC w/ less than 260 ppm Hg.
	36	Nonwastewaters from incinerator residues w/ less than 260 ppm Hg.
	37	All P092 wastewaters.
	38	2,4-D (2,4-Dichlorophenoxyacetic acid).
U241	39	2,4-D (2,4-Dichlorophenoxyacetic acid) salts and esters.

RECYCLING/TSD HANDLING AGREEMENT

(GENERATOR AND RECYCLING/TSD CONTRACTOR)



WHEREAS, Generator produces spent chemicals which may be considered to be "hazardous" or "toxic" within the meaning of applicable federal and state laws ("Spent Chemicals") and which therefore must be transported, stored, disposed of, recycled, treated or re-used (as defined) in accordance with applicable laws pertaining to hazardous or toxic chemicals;

WHEREAS, Recycling/TSD Contractor owns or controls facilities which are capable of Handling Spent Chemicals in accordance with applicable laws pertaining to such activities;

WHEREAS, the parties desire to enter into an arrangement for the Handling of Spent Chemicals, all on the terms and conditions hereinafter set forth;

NOW, THEREFORE, in consideration of the covenants and agreements contained herein, the undersigned agree to the following terms and conditions of this Recycling/TSD Handling Agreement as well as to the Standard Terms and Conditions Governing the Handling of Spent Chemicals ("Standard Terms and Conditions"), which are attached to the Generator copy of this Agreement and are incorporated herein by reference. All capitalized terms not otherwise defined herein shall have the meanings set forth in the Standard Terms and Conditions.

1. SPENT CHEMICALS SHIPMENT. The completed Uniform Hazardous Waste Manifest or appropriate state manifest which is identified by the reference number appearing in a space below the signatures to this Agreement and which pertains to the Spent Chemicals Shipment Handled under this Agreement is hereby incorporated herein by reference. Such manifest describes certain Spent Chemicals which Generator hereby agrees to ship to Recycling/TSD Contractor and which Recycling/TSD Contractor agrees to Handle at the facility named in such manifest ("Designated Facility").

2. COLLECTION, TRANSPORTATION, STORAGE AND DELIVERY. All Spent Chemicals Shipments shall be transported to Recycling/TSD Contractor by Van Waters & Rogers Inc., a Washington Corporation ("VW&R"), or an entity designated by VW&R to provide transportation and temporary storage services.

3. PAYMENT. It is understood that VW&R shall pay Recycling/TSD Contractor for Handling the Spent Chemicals Shipment (where money is owed to Generator, VW&R shall pay Generator for the Spent Chemicals Shipment) according to the terms of a certain Money Spent Chemicals Handling Agreement between Recycling/TSD Contractor and VW&R. Recycling/TSD Contractor shall not look to Generator for payment for Handling the Spent Chemicals Shipment, except for certain extraordinary charges incurred in connection with Non-conforming Spent Chemicals as set forth in the Standard Terms and Conditions.

4. INDEMNIFIED PARTY. As used in the Standard Terms and Conditions, the term "Indemnified Party" shall mean either Recycling/TSD Contractor or Generator, depending upon which party claims indemnification under this Agreement.

5. GENERATOR INDEMNIFICATION. Generator shall defend, indemnify and hold harmless Recycling/TSD Contractor, its present and future officers, directors, employees, agents, insurers and successors (hereinafter in this Paragraph referred to collectively as "Recycling/TSD Contractor") from and against any and all Loss which Recycling/TSD Contractor may sustain or incur, be responsible for or pay out as a result of:

(a) Generator's breach of any representation, warranty, term or provision of this Agreement; or

(b) The negligence or intentional misconduct of Generator, its employees, agents, representatives or subcontractors in the performance of this Agreement, provided that such indemnification shall not apply to the extent such liabilities result from Recycling/TSD Contractor's negligence or intentional misconduct or from a breach of this Agreement by Recycling/TSD Contractor.

6. NAMES AND ADDRESSES OF PERSONS TO WHOM NOTICE IS TO BE GIVEN. The name of the person to whom notice is to be given on behalf of Generator appears on the Uniform Hazardous Waste Manifest in Item 16 or the appropriate state manifest. The name of the person to whom notice is to be given on behalf of Recycling/TSD Contractor appears on the Uniform Hazardous Waste Manifest in Item 20 or the appropriate state manifest. The addresses of the persons to whom notice is to be given appear on the Uniform Hazardous Waste Manifest under Item 3 (for Generator) and Item 9 (for Recycling/TSD Contractor) or the appropriate state manifest.

RECYCLING/TSD HANDLING AGREEMENT

(GENERATOR AND RECYCLING/TSD CONTRACTOR)

The undersigned hereby agree that, upon execution of this Recycling/TSD Handling Agreement, there is a binding contract between them according to the above terms and conditions, as of the day and year appearing below.

GENERATOR EPA ID# IL T 180010340

RECYCLING/TSD CONTRACTOR:

FACILITY GP WALL COMPANY

PRINT NAME Kevin Prunsky

TITLE Chairman of the Board

PRINT NAME JOHN FLANNERY TITLE WHSE MGR

SIGNATURE [Signature]

DATE 3/23/01

RECYCLING/TSD CONTRACTOR SHIPMENT APPROVAL NUMBER 0102066987

WASTE MANIFEST DOCUMENT NUMBER 20725

STATE WASTE MANIFEST DOCUMENT NUMBER IL8829725

PCI- 40260 -C

TRANSPORTATION/HANDLING AGREEMENT GENERATOR AND VW&R

WHEREAS, Generator has certain shipments and a designated SPD of Spent Chemicals Stream to be transported, stored, transferred, handled, and disposed of by VW&R, and Generator desires to enter into an agreement with VW&R for the handling of such shipments and SPD, within the limitation of applicable federal and state laws and regulations;

WHEREAS, Generator and VW&R have entered into an agreement to transport and otherwise assist in the handling of such shipments and SPD;

NOW THEREFORE, in consideration of the covenants and agreements contained herein, the aforementioned Generator, its successors and assigns, as well as to the Standard Terms and Conditions Governing the Transportation/Handling of Spent Chemicals Stream, which are attached to the Generator Copy of this Agreement, and Generator's intent to be bound by the terms and conditions set forth in the Standard Terms and Conditions;

1. **DELIVERY.** Prior to the execution of this Agreement, Generator has selected the Designated Facility to perform Hazardous Waste Manifest for appropriate state manifest for the Handling of the Spent Chemicals Stream. Generator shall provide the reference number appearing above the signatures to this Agreement. Generator shall, if necessary, arrange for the Handling of such Spent Chemicals Shipment, including the execution of a Hazardous Waste Manifest. VW&R shall deliver the Spent Chemicals Shipment to such Designated Facility.

2. **CHARGES.** The amount to be paid by Generator to VW&R for the services to be rendered hereunder shall be based on VW&R's standard schedule of Posted Prices for the Approved Spent Chemicals Stream to which the Spent Chemicals Stream is subject to all terms, conditions, and credit provisions contained therein. VW&R shall pay Recycle fees for services rendered in connection with the Handling of the Spent Chemicals Shipment, except for certain charges incurred in connection with all or any portion of a Nonconforming Spent Chemicals Shipment, which Generator shall pay.

3. **WORK ON GENERATOR'S PREMISES.** Generator agrees to provide VW&R, its employees, subcontractors, a safe working environment for any work, in performing this Transportation/Handling Agreement, undertaken on premises owned or controlled by Generator, except for hazardous environmental work conditions or other locations which VW&R has caused.

4. **INDEMNIFICATION.** As used in the Standard Terms and Conditions, the term "Indemnified Party" shall be VW&R or Generator, depending upon which party claims indemnification under this Agreement. Generator shall defend, indemnify, and hold harmless the other, its past, present and future officers, directors, employees, and subcontractors, hereinafter in this Paragraph referred to collectively as "VW&R" or "Generator" from and against all claims, damages, losses, and expenses which VW&R or Generator may sustain or incur, be responsible for or pay out as a result of the representation, warranty, term, or provision of this Agreement.

5. **VW&R INDEMNIFICATION.** VW&R shall defend, indemnify, and hold harmless Generator from and against all claims, damages, losses, and expenses which Generator may sustain or incur, be responsible for or pay out as a result of:

(a) VW&R's breach of any representation, warranty, term or provision of this Agreement;

(b) VW&R's failure to act in connection with a Spent Chemicals Shipment which occurs during the term of this Agreement and the possession of VW&R or VW&R's agents, employees or subcontractors; or

(c) VW&R's negligence in connection with respect to a Spent Chemicals Shipment.

(d) Such loss arises from the action or the failure to act of Generator or any of its agents or employees.

(e) Generator's negligence in connection with a Spent Chemicals Shipment which occurs during the term of this Agreement and the possession of Generator or Generator's agents, employees or subcontractors.

(f) Generator is transporting the Spent Chemicals Shipment, either as a contractor to VW&R or as a subcontractor to VW&R.

(g) The negligence or intentional misconduct of Generator or its agents, employees or subcontractors in connection with this Agreement, provided that such indemnification shall not apply to the extent such negligence or intentional misconduct is caused by the negligence or intentional misconduct of VW&R or its agents, employees or subcontractors.




CERTIFICATE

This certificate is to verify that the waste specified is handled in accordance with all local, state and federal regulations as follows:

Manifest: IL8829725
Generator: CP HALL COMPANY

Section	Waste Stream	Handling Type
A	01020669	Recycled and/or Reclaimed

Facility Name: Pollution Control Industries
Facility Address: 4343 Kennedy Avenue
East Chicago, IN 46312
Facility EPA ID: IND000646943

Signature: 
Typed Name: Thomas R. McGillis
Title: Materials Manager
Date: 4/03/01

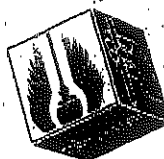
I-10014264

Pollution Control Industries
4343 Kennedy Avenue, East Chicago, IN 46312
(219) 397-3951 FAX: (219) 397-6411
www.pollutioncontrol.com

**RESPONSIBLESM
RECYCLING**

A commitment to our generators,
our employees, and our community.





MANUFACTURING AND
TECHNICAL CENTER
5851 WEST 73RD STREET
P.O. BOX 910
BEDFORD PARK, IL 60499-0910

THE C. P. HALL COMPANY
THE MATERIALS SCIENCE EXPERTS

PHONE 1-(708) 694-5990
PHONE 1-(312) 554-7400
FAX 1-(708) 594-1185
www.cphall.com

February 5, 2002

Mr. Patrick Kuefler
Waste, Pesticides and Toxics Division
US EPA
FAX: 312-353-4342

RE: Follow-up Documents from Feb. 1, 2002 Inspection
The C. P. Hall Company

Dear Mr. Kuefler:

Per your request at our recent inspection attached are the following documents:

- Land Disposal Restriction Form for Methanol

If I can be of further assistance, please let me know - 312-554-7422.

Sincerely,
THE C.P. HALL COMPANY

April A. Cesaretti, CHMM
Regulatory Affairs Manager

Enclosures

LAND DISPOSAL RESTRICTION NOTIFICATION FORM 1

CP WALL COMPANY

5851 WEST 73rd ST

BEDFORD PARK, IL 60499

YUT180010340

Manifest Number

IL0829800

Date

Yes

X

No

On Site at Facility

Date

7/13/01

BY HAZARDOUS WASTE (HWA)	HWA WASTE CODES (HWA 1-10)	SPECIALITY (HWA 1-10 and HWA 11-12)	TOXICITY GROUP (HWA 1-10 and HWA 11-12)		CALIFORNIA LIST WASTES	REGULATED CONSTITUENTS (HWA 1-10, HWA 11-12, HWA 13-14)
			Acute Toxicity	Chronic Toxicity		
50076/1	0001	1	X			162

CALIFORNIA LIST WASTES (for Column 6)

- 2) Halogenated Organic Carbon (HOC's) ≥ 1000 mg/l 3) Nickel (Ni) ≥ 1.54 mg/l 4) Thallium (Tl) ≥ 130 mg/l

REGULATED CONSTITUENTS FOR HWA 1, HWA 2, HWA 3, HWA 4, HWA 5 (for Column 7)

- | | | | |
|------------------------------|-----------------------------------|----------------------------|---|
| 1) Benzene | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 2) Benzene, Alkylated | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 3) Carbon Disulfide | 14) 1,2 Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 4) Carbon Tetrachloride | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trichloroethane |
| 5) Chlorobenzene | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 6) Cresols (o, m, p isomers) | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| | 18) Isobutanol (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I, the undersigned, certify that the above information is accurate and true.

Signature Dr. David Jennings
for CP Wall

Print Name DRUANN JENNINGS

LAND DISPOSAL RESTRICTION NOTIFICATION FORM I

Responsible Party/Location CP NATL COMPANY

5851 WEST 73rd ST

MIDFORD PARK IL 60499

EPA ID Number IL180010340

Manifest Number IL9544346

Manifest Analysis/Action

Yes

X

No

On file at facility

Date

1/4/2002

TIME PERIOD	RETENTION (EXPIRATION) (If retention of waste has not been regulated by the EPA)	WASTE CODE (If not regulated by the EPA)	WASTE NAME (If not regulated by the EPA)	WASTE QUANTITY (If not regulated by the EPA)	WASTE WEIGHT (If not regulated by the EPA)	WASTE VOLUME (If not regulated by the EPA)	WASTE DENSITY (If not regulated by the EPA)
50076/L		0001		1	2		162

CALIFORNIA LIST WASTES (for Column g)

1) PCB > 50 ppm 2) Unregulated Organic Carbon (UOC's) > = 1000 mg/L 3) Nickel (Ni) > = 100 mg/L 4) Titanium (Ti) > = 100 mg/L

REGULATED CONSTITUENTS FOR F001, F002, F003, F004, F005 (for Column h)

- | | | | |
|---------------------------------|----------------------------------|----------------------------|---|
| 1) Acetone | 12) Cresylic Acid | 19) Methanol | 26) Toluene |
| 2) Benzene | 13) Cyclohexanone | 20) Methylene Chloride | 27) 1,1,1 Trichloroethane |
| 3) Ethyl Alcohol | 14) 1,2-Dichlorobenzene | 21) Methyl Ethyl Ketone | 28) 1,1,2 Trichloroethane |
| 4) Carbon Disulfide | 15) Ethyl Acetate | 22) Methyl Isobutyl Ketone | 29) 1,1,2 Trichloro 1,2,2 Trifluoroethane |
| 5) Carbon Tetrachloride | 16) Ethyl Benzene | 23) Nitrobenzene | 30) Trichloroethylene |
| 6) Chlorobenzene | 17) Ethyl Ether | 24) Pyridine | 31) Trichlorofluoromethane |
| 7) Cresols (o, m, or p isomers) | 18) Isodurene (Isobutyl alcohol) | 25) Tetrachloroethylene | 32) Xylene (Total) |

I hereby certify under penalty of law that the above information is accurate and true.

Signature

Druann Jennings
on Behalf of C. Hall

Print Name

Druann Jennings

TABLE I - UNIVERSAL TREATMENT STANDARDS
REGULATED CONSTITUENTS FOR D001*, D002, D012-D043, R039 (for Column h)

#	Constituent	#	Constituent	#	Constituent
331	Acenaphthylene	107	1,2-Dichloroethane	178	3-Nitro-o-toluidine
341	Acenaphthene	108	1,1-Dichloroethylene	179	o-Nitrophenol
351	Acetone	109	trans-1,2-Dichloroethylene	180	p-Nitrophenol
361	Acetanilide	110	1,4-Dichlorobenzene	181	N-Nitrosodimethylamine
371	Acetophenone	111	2,4-Dichlorophenol	182	N-Nitrosodimethylamine
381	2-Acetylnaphthol	112	1,2-Dichloropropane	183	N-Nitroso-di-n-butylamine
391	Acrolein	113	cis-1,3-Dichloropropylene	184	N-Nitrosomethylphenylamine
401	Acrylamide	114	trans-Dichloropropylene	185	N-Nitrosomorpholine
411	Acrylonitrile	115	Dieldrin	186	N-Nitrosopiperidine
421	Alar	116	Dimethyl phthalate	187	N-Nitrosopyrrolidine
431	4-Aminobiphenyl	117	Diethyl phthalate	188	Parathion
441	Aniline	118	Di-n-butyl phthalate	189	Total PCBs (sum of all PCB isomers, or all Aroclors)
451	Anthracene	119	1,4-Dinitrobenzene	190	Pentachlorobenzene
461	Arenic	120	4,6-Dinitro-o-cresol	191	PeCDDs (All Pentachlorodibenzo-p-dioxins)
471	alpha-BHC	121	2,4-Dinitrophenol	192	PeCDFs (All Pentachlorodibenzofurans)
481	beta-BHC	122	2,4-Dinitrotoluene	193	Pentachloroethane
491	delta-BHC	123	2,6-Dinitrotoluene	194	Pentachloronitrobenzene
501	gamma-BHC	124	Di-n-octyl phthalate	195	Pentachlorophenol
511	Benzene	125	p-Dimethylaminostyrene	196	Phenacetin
521	Benzobenzothiazene	126	Di-n-propylthiourea	197	Phenanthrene
531	Benzal chloride	127	1,4-Dioxane	198	Phenol
541	Benzobiphenylene (difficult to distinguish from benzo(k)fluoranthene)	128	Diphenylamine (difficult to distinguish from diphenylthiourea)	199	Phorate
551	Benzobiphenylene (difficult to distinguish from benzo(k)fluoranthene)	129	Diphenylhydrazine (difficult to distinguish from diphenylamine)	200	Phthalic acid
561	Benzofluoranthene	130	1,2-Diphenylhydrazine	201	Phthalic anhydride
571	Benzofluoranthene	131	Dioxane	202	Phthalimide
581	Bromodichloromethane	132	Dioxin	203	Pyrene
591	Methyl bromide (Bromomethane)	133	Dioxin	204	Pyridine
601	4-Bromophenyl phenyl ether	134	Dioxin	205	Safrole
611	n-Butyl alcohol	135	Dioxin	206	Silver (2,4,5-TP)
621	Butyl benzyl phthalate	136	Dioxin	207	2,4,5-T (2,4,5-Trichlorophenoxyacetic acid)
631	2-sec-Butyl-4,6-dinitrophenol (Dinoseb)	137	Diethyl acrylate	208	1,2,4,5-Tetrachlorobenzene
641	Carbon disulfide	138	Diethyl cyanide (Propenenitrile)	209	TCDDs (All Tetrachlorodibenzo-p-dioxins)
651	Carbon tetrachloride	139	Diethyl benzene	210	TCDFs (All Tetrachlorodibenzofurans)
661	Chlorane (alpha and gamma isomers)	140	Diethyl ether	211	1,1,1,2-Tetrachloroethane
671	p-Chloroaniline	141	Diethyl phthalate	212	1,1,2,2-Tetrachloroethane
681	Chlorobenzene	142	Diethyl methacrylate	213	Tetrachloroethylene
691	Chlorobenzonitrile	143	Ethylene oxide	214	2,3,4,6-Tetrachlorophenol
701	2-Chloro-1,3-butadiene	144	Fluoranthene	215	Toluene
711	Chlorodibromomethane	145	Fluorene	216	Toxaphene
721	Chloroethane	146	Heptachlor	217	Bromochloro (Trichloromethane)
731	bis(2-Chloroethoxy)methane	147	Heptachlor epoxide	218	1,2,4-Trichlorobenzene
741	bis(2-Chloroethyl)ether	148	Hexachlorobenzene	219	1,1,1-Trichloroethane
751	Chloroform	149	Hexachlorobutadiene	220	1,1,2-Trichloroethane
761	bis(2-Chloroisopropyl)ether	150	Hexachlorocyclopentadiene	221	Trichloroethylene
771	p-Chloro-m-cresol	151	Hexachlorocyclopentadiene	222	Trichloromethanefluoromethane
781	2-Chloromethyl vinyl ether	152	Hexachlorocyclopentadiene	223	2,4,5-Trichlorophenol
791	Chloromethane (Methyl chloride)	153	Hexachlorocyclopentadiene	224	2,4,6-Trichlorophenol
801	2-Chloronaphthalene	154	Hexachlorocyclopentadiene	225	1,2,3-Trichloropropane
811	2-Chlorophenol	155	Hexachlorocyclopentadiene	226	1,1,2-Trichloro-(1,2,2-trifluoroethane)
821	3-Chloropropylene	156	Hexachlorocyclopentadiene	227	tris-(2,3-Dibromopropyl) phosphate
831	Chrysene	157	Hexachlorocyclopentadiene	228	Vinyl chloride
841	o-Cresol	158	Hexachlorocyclopentadiene	229	Xylenes-mixed isomers (sum of o, m, and p-ylene concentrations)
851	m-Cresol (difficult to distinguish from p-cresol)	159	Hexachlorocyclopentadiene		
861	p-Cresol (difficult to distinguish from m-cresol)	160	Hexachlorocyclopentadiene	230	Antimony
871	Cyclohexanone	161	Hexachlorocyclopentadiene	231	Arsenic
881	1,2-Dibromo-3-chloropropane	162	Hexachlorocyclopentadiene	232	Barium
891	Ethylene dibromide (1,2-Dibromoethane)	163	Hexachlorocyclopentadiene	233	Beryllium
901	Dibromomethane	164	Hexachlorocyclopentadiene	234	Cadmium
911	2,4-D (2,4-Dichlorophenoxyacetic acid)	165	Hexachlorocyclopentadiene	235	Chromium (Total)
921	o,p-DDD	166	Hexachlorocyclopentadiene	236	Cyanides (Total)
931	p,p-DDD	167	Hexachlorocyclopentadiene	237	Cyanides (Amenable)
941	o,p-DDE	168	Hexachlorocyclopentadiene	238	Fluoride
951	p,p-DDE	169	Hexachlorocyclopentadiene	239	Lead
961	o,p-DDT	170	Hexachlorocyclopentadiene	240	Mercury-Nonwastewater from Refractory
	p,p-DDT	171	Hexachlorocyclopentadiene	241	Mercury-All Others
	Dibenz(a,h)anthracene	172	Hexachlorocyclopentadiene	242	Nickel
	Dibenz(a,p)pyrene	173	Hexachlorocyclopentadiene	243	Selenium
1001	m-Dichlorobenzene	174	Hexachlorocyclopentadiene	244	Silver
1011	o-Dichlorobenzene	175	Hexachlorocyclopentadiene	245	Sulfide
1021	p-Dichlorobenzene	176	Hexachlorocyclopentadiene	246	Thallium
1031	Dichlorodifluoromethane	177	Hexachlorocyclopentadiene	247	Vanadium
1041	1,1-Dichloroethane	178	Hexachlorocyclopentadiene	248	Zinc
		179	Hexachlorocyclopentadiene	249	none apply

TABLE II

The following waste codes have subcategories and the appropriate key number must be selected and placed in Column d on FORM #1.

WASTE CODES	KEY NUMBER	SUBCATEGORY
D001	1	High TOC ignitable liquids.
	2	Low TOC ignitable liquids managed in CWA/CWA equivalent/Class I SDWA systems.
	3	Low TOC ignitable liquids managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.
D002	4	Corrosive waste managed in non-CWA/non-CWA equivalent/non-Class I SDWA systems.
	5	Corrosive waste managed in CWA/CWA equivalent/Class I SDWA systems.
D003	6	Reactive Sulfides
	7	Other Reactives
	8	Water Reactive
	9	Reactive Cyanides
D006	10	Characteristic for Pb based on extraction procedure.
	11	Cadmium containing batteries.
D008	12	Characteristic for Hg based on extraction procedure.
	13	Lead Acid Batteries
D009	14	Low Mercury (< 250 ppm total Hg)
	15	All D009 wastewaters.
F003 F005	16	Wastes that contain only one or more of the following solvents: carbon disulfide, cyclohexanone, and/or methanol.
F005	17	Contains only 2-Propanone.
	18	Contains only 2-Ethoxyethanol.
F025	19	Light Ends.
	20	Spent Filters/Aids and Desiccants.
K006	21	Anhydrous.
	22	Hydrated.
U151	23	Nonwastewaters that contain >250mg/kg total mercury
	24	All U151 (mercury) wastewaters
K071	25	Nonwastewaters that are residues from RMERC
	26	Nonwastewaters that are not residues from RMERC
	27	All K071 wastewaters
P047	28	4,6-Dinitro-o-cresol
	29	4,6-Dinitro-o-cresol salts
P065	30	Nonwastewaters from incinerator or RMERC residues.
	31	Nonwastewaters from RMERC w/ less than 260 ppm Hg.
	32	Nonwastewaters from incinerator residues w/ less than 260 ppm Hg.
	33	All P065 wastewaters.
P092	34	Nonwastewaters from incinerator or RMERC residues.
	35	Nonwastewaters from RMERC w/ less than 260 ppm Hg.
	36	Nonwastewaters from incinerator residues w/ less than 260 ppm Hg.
	37	All P092 wastewaters.
U240	38	2,4-D (2,4-Dichlorophenoxyacetic acid)

To: Mr. Patrick Kuefler, US EPA

Fax: 312-353-4342

From: April Cesarotti, CP Hall

Date: 2/5/02

Re: Follow-up from Feb. 1, 2002

Pages: 6 including fax page

CC:

☒ Urgent

☐ For Review

☐ Please Comment

☐ Please Reply

☐ Please Recycle

You have not attached a letter and attachments.

APPR
Cesarotti

2-4 ea. BS.

miner

The C. P. Hall Company

Established 1919

CHEMICALS FOR INDUSTRY

7300 S. CENTRAL AVENUE

CHICAGO, ILLINOIS 60638

ANDERSON, SOUTH CAROLINA
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SEP 20 1982

WASTE MANAGEMENT BRANCH
EPA, REGION V

September 16, 1982

Mr. Karl J. Klepitsch, Jr., Chief
Waste Management Branch
United States Environmental Protection Agency
Region V
111 West Jackson Boulevard
Chicago, Illinois 60604

RE: Request for Information - Hazardous
Waste Permit Review (Recycling)
FACILITY: The C. P. Hall Company
5851 West 73rd Street
Bedford Park, Illinois 60638
USEPA ID NO: ILT 180 010 340 C, PA

Dear Mr. Klepitsch:

This is to acknowledge receipt of your letter of August 20, 1982 requesting further clarification that would preclude this location requiring a permit under paragraph 3005 of RCRA, as amended.

We do recycle, reclaim for our use or for resale about 99 percent of our "waste" streams at the present time and we have been doing this prior to November 19, 1980. The remaining one percent is removed from the waste treatment system through the use of a rotary vacuum filter coated with diatomaceous earth and then removed from our premises by a waste disposal company in less than a 90-day period.

Therefore, as detailed in 40 CFR, Part 262.34 all of the waste generated for disposal is held for less than 90 days and we are therefore exempt. The balance is beneficially recycled for resale and this is covered as an exclusion and therefore, not regulated under 40 CFR, Part 261.6. Also since none of our materials are subject to 40CFR265, we are not filing a closure plan.

RECEIVED
9/24/82

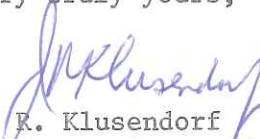
Mr. Karl J. Klepitsch

-2-

September 16, 1982

In summation, therefore, we are requesting a withdrawal of our permit application. In addition, I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

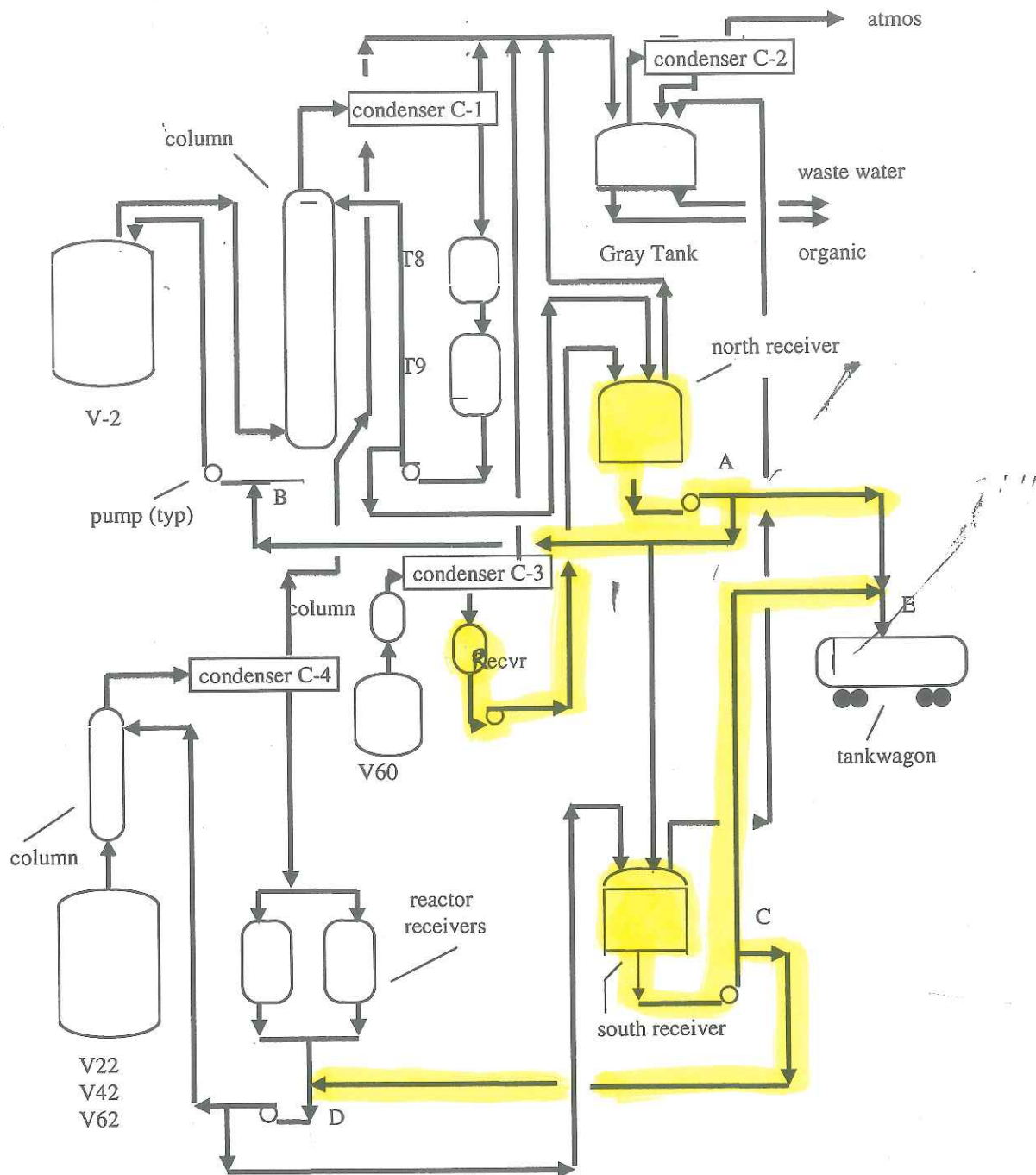
Very truly yours,



J. R. Klusendorf
Vice President and Treasurer

JRK:dlm

ILT 180610340

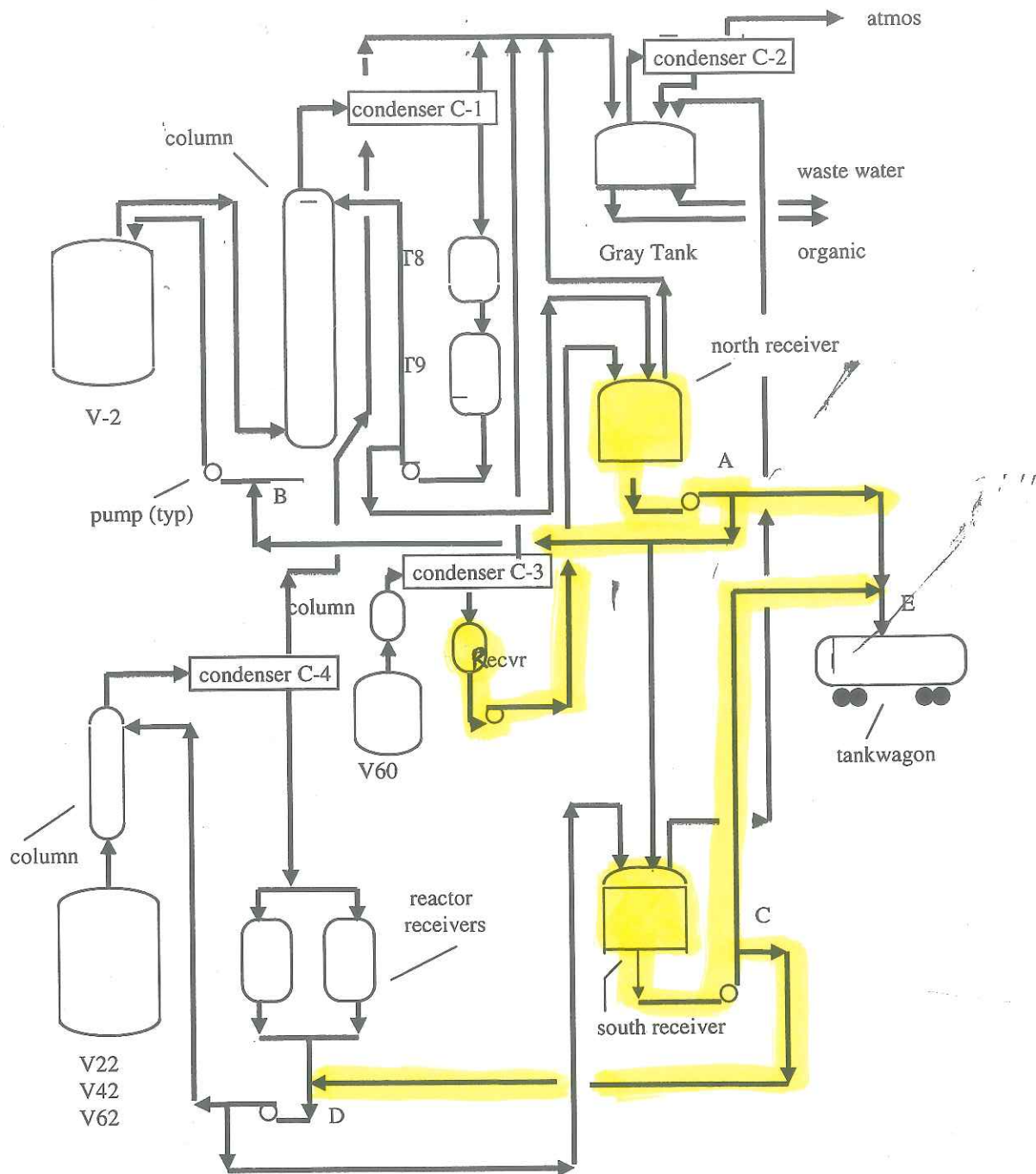


METHANOL PROCESS FLOW DIAGRAM
5851 FACILITY

LEGEND

V-2 & V-60 liquid-- RED
V22,V42,V62 liquid-- GREEN
VAPORS -- BLUE

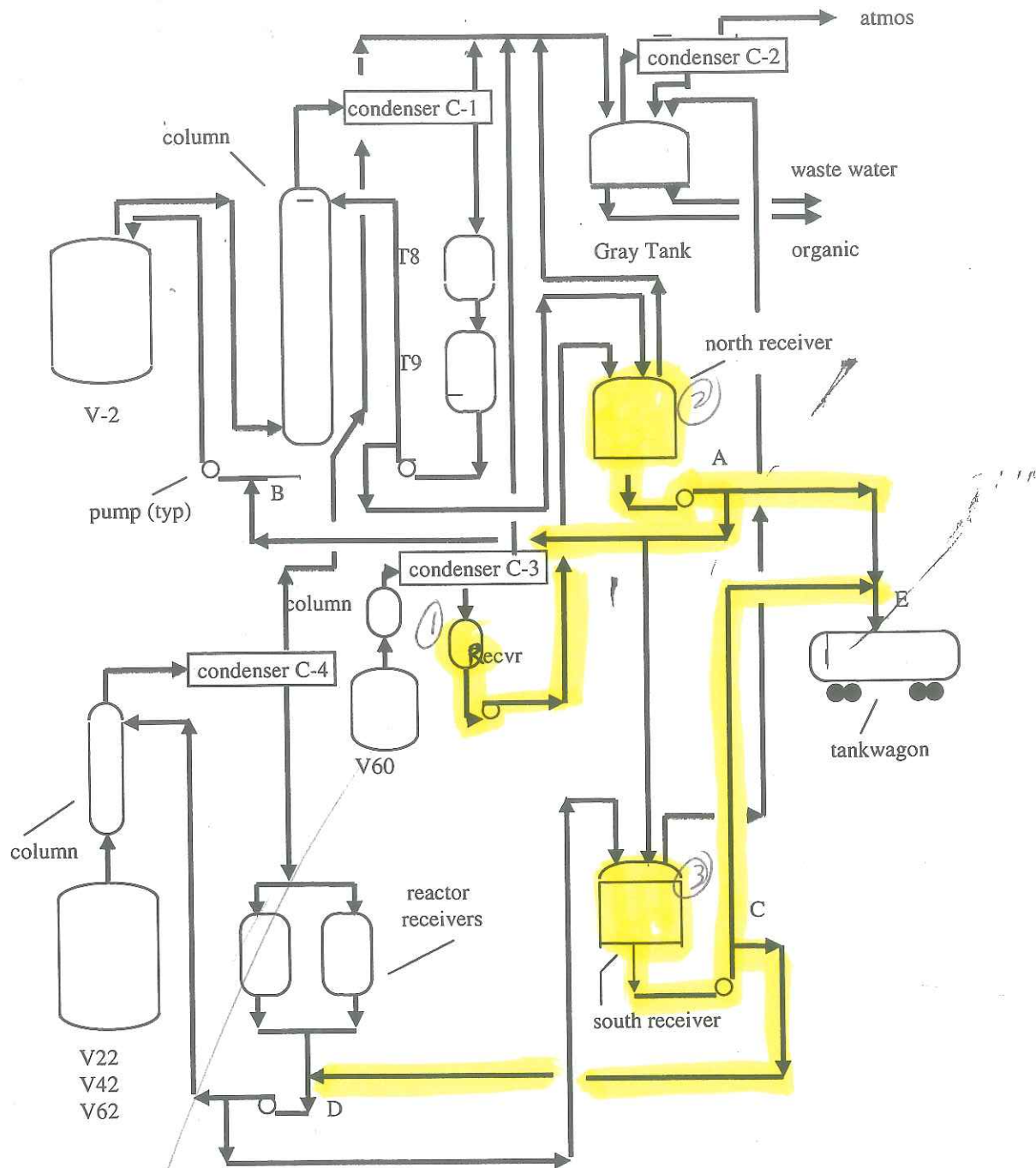
ILT 180610340



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